

EXHIBIT A

Ester Lorusso

12/19/2007

Page 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 ESTER LORUSSO,

4 Plaintiff,

5 Case No.
6 07CV3583 (LBS) (RLE)

7 -against-

8 ALITALIA-LINEE AEREE ITALIANE SpA

9 Defendant.

10 -----X

11
12
13 Videotaped Deposition of Ester Lorusso

14 December 19, 2007

15 New York, New York

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17
18
19
20
21
22
23 REPORTED BY:

24 Helen Mendlowich

Ester Lorusso

12/19/2007

<p>1 LORUSSO</p> <p>2 Q. You just remember that he said it?</p> <p>3 A. Absolutely.</p> <p>4 Q. Do you remember the context in which he 5 said it?</p> <p>6 A. No.</p> <p>7 Q. Do you know if anybody else was present 8 when he said that?</p> <p>9 A. No.</p> <p>10 Q. Did he give you any examples of how he 11 felt Mr. Libutti couldn't deal with women in higher 12 positions?</p> <p>13 A. Yes. Mr. Libutti wanted me out of the 14 office.</p> <p>15 Q. Mr. Gallo told you Mr. Libutti wanted you 16 out?</p> <p>17 A. I don't remember if he told me 18 specifically but he definitely alluded to it.</p> <p>19 Q. I'm not too clear.</p> <p>20 A. I'm not too clear on your question. Let's 21 go back.</p> <p>22 Q. Let's go back.</p> <p>23 Did he specifically tell you that Mr. 24 Libutti wanted you out?</p> <p>25 A. Yes, he did. Yes.</p>	<p>Page 30</p> <p>1 LORUSSO</p> <p>2 Q. -- of women with whom Mr. Libutti couldn't 3 deal who were in high places?</p> <p>4 A. I don't recall.</p> <p>5 Q. You do recall that he said that Libutti 6 couldn't deal with women in high positions, for 7 example he wanted to get rid of you?</p> <p>8 A. Yes.</p> <p>9 Q. Did Mr. Libutti fire you in 2004?</p> <p>10 A. No.</p> <p>11 Q. Did Mr. Libutti fire you in 2005?</p> <p>12 A. No.</p> <p>13 Q. Did Mr. Libutti fire you in 2006?</p> <p>14 A. No.</p> <p>15 Q. Did Mr. Libutti fire you in 2007?</p> <p>16 A. He wasn't there.</p> <p>17 Q. So the answer is no.</p> <p>18 A. So the answer is no.</p> <p>19 Q. Yes. Do you know of any women in high 20 positions who Mr. Libutti did fire?</p> <p>21 A. There were no other women in high 22 positions besides me.</p> <p>23 Q. Are you sure of that?</p> <p>24 A. In North America?</p> <p>25 Q. Yes.</p>
<p>1 LORUSSO</p> <p>2 Q. And that was a few years ago that he said 3 that?</p> <p>4 A. Yes.</p> <p>5 Q. Can you recall what position you were in 6 at the time?</p> <p>7 A. Yes.</p> <p>8 Q. What position were you in at the time?</p> <p>9 A. I was the director of marketing.</p> <p>10 Q. Director of marketing for Alitalia, 11 Passenger Division?</p> <p>12 A. Yes.</p> <p>13 Q. Do you recall how long Mr. Libutti had 14 been in the New York office at the time Mr. Gallo 15 said this?</p> <p>16 A. Approximately a year.</p> <p>17 Q. Would you say this was said in the summer 18 of 2004?</p> <p>19 A. It was said sometime in 2004.</p> <p>20 Q. Did Mr. Libutti give any other examples --</p> <p>21 pardon me. Did Mr. Gallo give any other examples at 22 the time of --</p> <p>23 A. I don't recall.</p> <p>24 MS. KURZON: You have to let him finish.</p> <p>25 A. Sorry.</p>	<p>Page 31</p> <p>1 LORUSSO</p> <p>2 A. Yes.</p> <p>3 Q. What about Lucia Alla?</p> <p>4 A. She wasn't in a high position at that time 5 when Libutti was there.</p> <p>6 Q. She was not in a high position when Mr. 7 Libutti was there?</p> <p>8 A. No, she was not.</p> <p>9 Q. After Mr. Gallo told you sometime in 2004 10 that Mr. Libutti couldn't deal with women in high 11 positions, did he ever repeat that statement again?</p> <p>12 A. I don't recall.</p> <p>13 Q. You don't recall?</p> <p>14 A. I don't recall.</p> <p>15 Q. Did Mr. Gallo mention Mr. Libutti during 16 your coffee?</p> <p>17 A. By name? I don't recall.</p> <p>18 Q. You said that Mr. Gallo did mention 19 Alitalia policies about women at the coffee?</p> <p>20 MS. KURZON: Objection. I think she 21 actually said they didn't talk about policies.</p> <p>22 MR. KORAL: You are correct. She did 23 testify to that.</p> <p>24 Q. You said that Mr. Gallo spoke about 25 Alitalia and women at your coffee?</p>

9 (Pages 30 to 33)

Ester Lorusso

12/19/2007

		Page 42	Page 44
1	LORUSSO		
2	MR. KORAL: When Mr. Gallo was talking		
3	about leaders of the company openly and		
4	privately expressing contempt for older		
5	employees, females and homosexuals.		
6	A. It would be throughout the period that I		
7	worked for the company.		
8	Q. Yes. And who, specifically, do you		
9	understand those leaders were during this period?		
10	And I'm only interested in 2004 going forward.		
11	A. That would be Giulio Libutti.		
12	Q. Anybody from Rome that you understand is a		
13	leader of the company who expressed openly or		
14	privately contempt for older employees, females and		
15	homosexuals?		
16	A. There are others, or there were others in		
17	Rome.		
18	Q. But you don't know their names?		
19	A. At this time, no. I don't recall.		
20	Q. Did you ever hear Giulio Libutti openly		
21	express contempt for older employees?		
22	A. I don't recall.		
23	Q. Did you ever hear Giulio Libutti privately		
24	express contempt for older employees?		
25	A. I don't recall.		
		Page 43	Page 45
1	LORUSSO		
2	Q. Did you ever hear Giulio Libutti openly		
3	express contempt for females?		
4	A. Yes.		
5	Q. How many times?		
6	A. I don't recall.		
7	Q. Can you recall any single instance?		
8	A. A single instance? He referred to a		
9	female marketing executive in Rome and he alluded to		
10	the fact that she could get a higher position if she		
11	would sleep with someone.		
12	Q. Who was that female employee?		
13	A. Silvia Del Sole.		
14	Q. Silvia --		
15	A. -- Del Sole.		
16	Q. You said that statement was made publicly?		
17	A. That statement was made before me and one		
18	of my colleagues.		
19	Q. Who was the colleague?		
20	A. Gabriele Mariotti.		
21	Q. Did you ever tell Silvia Del Sole that Mr.		
22	Libutti had said that?		
23	A. No.		
24	Q. Did you ever tell anybody else that Mr.		
25	Libutti had said that, apart from your attorneys?		

12 (Pages 42 to 45)

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Ester Lorusso

12/19/2007

	Page 46	Page 48
1	LORUSSO	
2	Q. Maybe to save time, is that true as well	Q. Wasn't it director of sales and alliances?
3	for contempt for females and homosexuals, that you	A. That could be, yes.
4	can't recall any specific instances that Mr. Gallo	Q. Do you know when Tim O'Neill came back to
5	gave you?	Alitalia in that capacity?
6	A. No. They were just general statements	A. It was either 2003 or 2004. 2003, I
7	that he would make, but I don't remember the	think. 2003, I believe.
8	specific instances.	Q. Had you held that position of director of
9	Q. Do you believe he made those statements	sales and alliances?
10	more than once to you?	A. No.
11	A. Yes.	Q. So Tim O'Neill wasn't taking that position
12	Q. Did he ever put a statement like this in	away from you when he got it?
13	writing that you have seen?	A. No.
14	A. No.	Q. When was Tim O'Neill given your position?
15	Q. Did Mr. Gallo indicate to you that he had	A. It was throughout the time that our boss
16	ever protested anything that he regarded as	was Giulio Libutti.
17	expressions by leaders of the company of contempt	Q. Mr. Libutti came in the summer of 2003; is
18	for older employees, females or homosexuals?	that correct?
19	A. Yes.	A. I believe so.
20	Q. What do you recall him telling you about	Q. So starting when Mr. Libutti came and
21	his protesting?	continuing onward Mr. Libutti was giving your
22	A. Specifically to discriminating against me	responsibilities to Tim O'Neill?
23	at the time it was happening. I believe he told	A. Slowly, yes.
24	Libutti that it was unlawful to discriminate against	Q. You say that Mr. Gallo told you that he
25	female employees in the United States.	told Mr. Libutti that this was sex discrimination
	Page 47	
1	LORUSSO	
2	Q. When did Mr. Gallo tell you that he told	and that it was illegal in the U.S.?
3	Libutti that it was unlawful to discriminate against	A. I'm sorry, repeat your question.
4	female employees in the United States in connection	(Testimony was read back.)
5	with your situation?	A. Yes.
6	A. I don't remember.	Q. Yes is the answer.
7	Q. Can you recall what position you were in	You probably answered this but now that we
8	at the time that Mr. Gallo says that he said this to	are talking about it, can you recall approximately
9	Libutti?	when Mr. Gallo told you that he told this to
10	A. No.	Libutti?
11	Q. Can you recall what the details of the	A. I don't recall.
12	discrimination were that Mr. Gallo was supposedly	Q. You don't recall when Gallo told you?
13	protesting to Libutti?	A. Right.
14	A. Yes. That my job was being given to a	Q. Do you know if Gallo told you when he told
15	male employee.	this to Libutti?
16	Q. And is that male employee Tim O'Neill?	A. Do I recall -
17	A. Yes.	Q. Well, he could have said it in 2003,
18	Q. Tim O'Neill had been the head of Italia	apparently, he could have said it in 2004. Libutti
19	Tours?	was there until 2006.
20	A. Yes, years back.	Do you have any idea when Gallo said to
21	Q. And then Tim O'Neill came back to Alitalia	Libutti, this is sex discrimination, it's illegal?
22	in the Passenger Division?	A. It had to have been after I first made a
23	A. Yes.	complaint.
24	Q. What was his title?	Q. Would that be around September of 2004?
25	A. I believe it was director of alliances.	A. That would be in the summer of 2004.
	Page 49	
1	LORUSSO	
2	and that it was illegal in the U.S.?	
3	A. I'm sorry, repeat your question.	
4	(Testimony was read back.)	
5	A. Yes.	
6	Q. Yes is the answer.	
7	You probably answered this but now that we	
8	are talking about it, can you recall approximately	
9	when Mr. Gallo told you that he told this to	
10	Libutti?	
11	A. I don't recall.	
12	Q. You don't recall when Gallo told you?	
13	A. Right.	
14	Q. Do you know if Gallo told you when he told	
15	this to Libutti?	
16	A. Do I recall -	
17	Q. Well, he could have said it in 2003,	
18	apparently, he could have said it in 2004. Libutti	
19	was there until 2006.	
20	Do you have any idea when Gallo said to	
21	Libutti, this is sex discrimination, it's illegal?	
22	A. It had to have been after I first made a	
23	complaint.	
24	Q. Would that be around September of 2004?	
25	A. That would be in the summer of 2004.	

13 (Pages 46 to 49)

Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 82</p> <p>1 LORUSSO</p> <p>2 A. I don't recall.</p> <p>3 Q. Did he ever tell you of any private</p> <p>4 expression of contempt for older employees by any</p> <p>5 leader of the company based upon age?</p> <p>6 A. Let's go back to the previous question</p> <p>7 which was public.</p> <p>8 Q. Yes.</p> <p>9 A. He told me that when Libutti left, he</p> <p>10 announced to everyone, I am so happy. One of my</p> <p>11 greatest accomplishments here was to get rid of the</p> <p>12 older folks and put in younger blood, or something</p> <p>13 to that effect.</p> <p>14 Q. Okay. Were you present to hear Libutti's</p> <p>15 statement?</p> <p>16 A. I was not.</p> <p>17 Q. Did Mariotti tell you where Libutti was</p> <p>18 when he said this?</p> <p>19 A. Yes. He was in one of the corridors on</p> <p>20 the 37th floor.</p> <p>21 Q. So this wasn't a general announcement. It</p> <p>22 was made to some people in the corridor?</p> <p>23 A. No.</p> <p>24 Q. It was a general announcement?</p> <p>25 A. No. It was just -- he said it out loud.</p>	<p style="text-align: right;">Page 84</p> <p>1 LORUSSO</p> <p>2 Q. That's good.</p> <p>3 A. I don't know if I would label this as</p> <p>4 contempt, however, when Libutti and Galli first came</p> <p>5 to New York they addressed the entire company and</p> <p>6 the first words out of Galli's mouth were, I'm not</p> <p>7 going to say much because speeches are like women's</p> <p>8 skirts. The shorter, the better.</p> <p>9 Q. Okay. You heard him say that?</p> <p>10 A. I most certainly did.</p> <p>11 Q. Did he say anything -- did you ever hear</p> <p>12 Galli say anything else that you considered to be</p> <p>13 disrespectful of older employees?</p> <p>14 A. No. I don't recall.</p> <p>15 Q. Actually, I assume that that's a comment</p> <p>16 that's really in regard as being disrespectful or</p> <p>17 contemptuous of women rather than older employees?</p> <p>18 A. You're right.</p> <p>19 Q. So you are anticipating my question. If</p> <p>20 you cannot think of anything else regarding older</p> <p>21 employees, let us go on to statements -- other than</p> <p>22 the one that you just mentioned made by Galli -- in</p> <p>23 which leaders of the company openly expressed</p> <p>24 contempt to women.</p> <p>25 Galli made that comment. Can you recall</p>
<p style="text-align: right;">Page 83</p> <p>1 LORUSSO</p> <p>2 Q. He said it out loud and Mariotti overheard</p> <p>3 it or was it a statement made to Mariotti, if you</p> <p>4 know?</p> <p>5 A. I don't recall.</p> <p>6 Q. Did Mariotti mention if anybody else was</p> <p>7 around?</p> <p>8 A. I believe he did.</p> <p>9 Q. Did he mention who?</p> <p>10 A. He may have.</p> <p>11 Q. But you don't recall?</p> <p>12 A. No.</p> <p>13 Q. Then the question was, did Mariotti ever</p> <p>14 tell you of any instances in which leaders of the</p> <p>15 company privately expressed contempt for older</p> <p>16 employees?</p> <p>17 A. Well, yes. I just told you about the</p> <p>18 older woman.</p> <p>19 Q. Oh, that was said one-on-one?</p> <p>20 A. Between Libutti and Mariotti.</p> <p>21 Q. Okay. Any other instances where Libutti</p> <p>22 or any other leader of the company expressed</p> <p>23 privately some contempt for older employees?</p> <p>24 A. Not privately but let's go back to</p> <p>25 publicly. As you're speaking things are coming up.</p>	<p style="text-align: right;">Page 85</p> <p>1 LORUSSO</p> <p>2 Mariotti telling you of any statements that leaders</p> <p>3 of the company made openly expressing contempt for</p> <p>4 women?</p> <p>5 A. No, not openly.</p> <p>6 Q. Okay. What about privately? Any comments</p> <p>7 in which leaders -- that Mariotti reported to you --</p> <p>8 A. Oh, I'm sorry. Can I go back to publicly?</p> <p>9 Q. Of course.</p> <p>10 A. Gabriele Mariotti told me that at Marco</p> <p>11 D'Ilario's good-bye party at his home --</p> <p>12 Q. Yes?</p> <p>13 A. -- Libutti said in front of a number of</p> <p>14 people something to the effect that I am leaving and</p> <p>15 I'm happy to be leaving so I don't have to worry</p> <p>16 about discrimination charges anymore. I could say</p> <p>17 what I want now.</p> <p>18 Q. Did he then proceed to say what he wanted?</p> <p>19 Did he say anything contemptuous of women or older</p> <p>20 people or homosexuals?</p> <p>21 A. Not that I know of.</p> <p>22 Q. You weren't present?</p> <p>23 A. I was not.</p> <p>24 Q. This was a party at Marco D'Ilario's home</p> <p>25 for Libutti?</p>

22 (Pages 82 to 85)

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Ester Lorusso

12/19/2007

	Page 86	Page 88											
1 LORUSSO		1 LORUSSO											
	Page 87												
1 LORUSSO		1 LORUSSO											

23 (Pages 86 to 89)

Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 90</p> <p>1 LORUSSO</p> <p>2 English, is totally incompetent, be placed in that 3 position when I wasn't even considered.</p> <p>4 Q. All right. What did Mr. Mariotti say?</p> <p>5 A. He basically repeated what I just said.</p> <p>6 Q. He said, Why would --</p> <p>7 A. Yes.</p> <p>8 Q. Did Mr. Mariotti indicate that he heard 9 the rumors and the reason was that Mr. Oksus was a 10 paramour of Mr. Gallo's?</p> <p>11 A. I don't remember the specifics of what was 12 said but the general conversation revolved around 13 that.</p> <p>14 Q. I'm sure I know the answer to this 15 question as well, but you never discussed these 16 rumors with Mr. Oksus?</p> <p>17 A. No. That's an emphatic no.</p> <p>18 Q. Specifically, do you recall any other 19 discussions of these rumors about Gallo and Oksus or 20 is it just an in-the-air kind of thing?</p> <p>21 A. It was in the air.</p> <p>22 Q. Do you recall if Mr. Mariotti specifically 23 mentioned Dolores Kitzig as the person about whom 24 denigrating remarks were made because she is old?</p> <p>25 A. I don't recall.</p>	<p style="text-align: right;">Page 92</p> <p>1 LORUSSO</p> <p>2 discussion.</p> <p>3 Q. Okay. He certainly never invited you to 4 any of his places?</p> <p>5 A. No.</p> <p>6 Q. Have you ever invited him to your 7 apartment, Mariotti?</p> <p>8 A. I think so.</p> <p>9 Q. Do you remember if he came?</p> <p>10 A. I believe so.</p> <p>11 Q. Do you recall how long ago?</p> <p>12 A. Yes, yes. He did come over one evening, 13 yes.</p> <p>14 Q. About how long ago was that?</p> <p>15 A. It must have been a while back because I 16 hardly remember. But he did come over, yes.</p> <p>17 Q. When is the last time you communicated 18 with Howard Tiegel?</p> <p>19 A. When he was at the company.</p> <p>20 Q. This was in 2002?</p> <p>21 A. Yes.</p> <p>22 Q. So you had no communications with him 23 since?</p> <p>24 A. No, I haven't.</p> <p>25 Q. There is a statement here that Tiegel can</p>
<p style="text-align: right;">Page 91</p> <p>1 LORUSSO</p> <p>2 Q. Did Mariotti mention that he was told to 3 fire Dolores Kitzig because she's old?</p> <p>4 A. I'm sorry. I didn't hear what you said.</p> <p>5 I thought you said Laurus. Dolores, that's her 6 name. She is the chicken.</p> <p>7 Q. She is the old chicken?</p> <p>8 A. Correct. She is the one I referred to 9 before, yes.</p> <p>10 Q. Do you know if she was ever fired?</p> <p>11 A. I don't know.</p> <p>12 Q. Was she still at the company when you 13 left?</p> <p>14 A. I don't know.</p> <p>15 Q. You don't know?</p> <p>16 A. I don't know.</p> <p>17 Q. On Mariotti you further state that he 18 resides in Manhattan. Do you know if that's a fact?</p> <p>19 A. Actually, it's not.</p> <p>20 Q. Where is he residing now?</p> <p>21 A. I'm not quite sure, but he had a place 22 upstate and he also had a place in Queens.</p> <p>23 He was very secretive about where he was 24 living, to be honest with you. Not secretive. I 25 shouldn't say that. It was just not up for</p>	<p style="text-align: right;">Page 93</p> <p>1 LORUSSO</p> <p>2 "describe how the New York office made 3 discriminatory employment decisions during Ms. 4 Lorusso's employment." This is paragraph 3. 5 I assume these are decisions that were 6 made while Mr. Tiegel was still there?</p> <p>7 A. Yes.</p> <p>8 Q. And he left in 2002 or 2003?</p> <p>9 A. I don't remember exactly when he left.</p> <p>10 Q. And "how the company had no regard for 11 American employment laws."</p> <p>12 Did you ever hear Mr. Tiegel say that?</p> <p>13 Did you ever hear him say that?</p> <p>14 A. No.</p> <p>15 Q. Did anybody ever tell you that he said 16 that?</p> <p>17 A. I don't think so.</p> <p>18 Q. In paragraph 3 the second time around, the 19 next paragraph 3, we have Mr. Mengozzi, who was a 20 former CEO of Alitalia. The statement says that he 21 "directed the managing director in New York to push 22 out the older workers in New York and replace them 23 with younger employees."</p> <p>24 First, did you ever hear Mr. Mengozzi give 25 such a direction?</p>

24 (Pages 90 to 93)

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Ester Lorusso

12/19/2007

	Page 110	Page 112
1	LORUSSO	LORUSSO
2	Libutti's behavior toward you once you went into	2 A. I believe it was the next day. It was an
3	GA2000 --	3 evening event.
4	A. No.	4 Q. And Elizabeth heard Mr. Libutti yelling at
5	Q. -- with Elizabeth?	5 you about those two things --
6	All right. Did you, at the time that you	6 A. I believe she did.
7	were still in marketing, discuss with Elizabeth Mr.	7 Q. -- about the greeters and about the
8	Libutti's alleged harassing of you?	8 telephone. You believe she did?
9	A. I may have.	9 A. Yes.
10	Q. You're not sure?	10 Q. And you believe you discussed it with her?
11	A. I'm not sure.	11 A. Yes.
12	Q. How about Mr. Libutti's berating you? Do	12 Q. What did she say?
13	you recall discussing that with Elizabeth?	13 A. I don't recall.
14	A. Yes.	14 Q. Do you recall what you said?
15	Q. You do recall that? What do you recall	15 A. No.
16	discussing with Elizabeth back when were you in	16 Q. Have you asked Elizabeth to be a witness
17	marketing about Mr. Libutti's berating you?	17 for you in this case?
18	A. I remember one incident. We were in	18 A. No. I have not.
19	Washington at a hotel and Libutti screamed at me in	19 Q. Stephanie Di Clemente, she was in HR,
20	the lobby of the hotel. And I remember discussing	20 correct?
21	it with Elizabeth.	21 A. Yes.
22	Q. What was Mr. Libutti screaming at you	22 Q. When is the last time you communicated
23	about?	23 with her?
24	A. I believe he wanted good-looking girls in	24 A. I literally bumped into her in the street.
25	skirts to be at the door or something to that	25 Q. About how long ago?
	Page 111	Page 113
1	LORUSSO	LORUSSO
2	effect, and I didn't deliver it or something to that	2 A. I don't recall.
3	effect.	3 Q. Within the last year?
4	I would need to check my notes for this.	4 A. Yes.
5	Q. This was the launch of the Washington	5 Q. Did you have any conversation about your
6	office?	6 termination?
7	A. Yes.	7 A. I believe I communicated to her that I was
8	MS. KURZON: Put on your mike, please.	8 no longer with Alitalia.
9	MR. KORAL: You're picking her up anyway?	9 Q. What's she doing these days?
10	Okay, good.	10 A. She is working in human resources for Polo
11	Q. Mr. Libutti was unhappy because you used	11 Ralph Lauren.
12	regular Alitalia staff to be the greeters and he	12 Q. Other than telling her that you've been
13	thought you should hire models?	13 terminated, did you have any other discussion about
14	A. That's correct.	14 Alitalia with Ms. Di Clemente when you ran into her?
15	Q. I read your notes.	15 A. Yes.
16	That's what he was screaming at you about?	16 Q. And you haven't communicated with her
17	A. That, and he kept trying to reach me on my	17 since?
18	cell phone but he was calling me on my office phone.	18 A. No.
19	So he thought I was purposely avoiding him.	19 Q. Did she give you her card?
20	Q. He was leaving messages on your office	20 A. Yes, she did.
21	phone?	21 Q. But you haven't called her?
22	A. Right. I didn't find out until I got back	22 A. No.
23	to the office in New York.	23 Q. Or e-mailed her?
24	Q. You don't check your office phone when	24 A. No.
25	you're out of town?	25 Q. Do you know whether your attorneys have

29 (Pages 110 to 113)

Ester Lorusso

12/19/2007

		Page 122	Page 124
1	LORUSSO		
2	Sciarresi had said that the company has no regard	1	You've described one such remark. Did you
3	for employment laws?	2	hear any others?
4	A. I don't recall.	3	A. I don't recall.
5	Q. Did anybody ever tell you that Mr.	4	Q. Did anybody ever report to you that Mr.
6	Sciarresi had described how discriminatory practices	5	Libutti had made sexist remarks?
7	Impacted his employment with Alitalia?	6	A. Gabriele did.
8	A. I don't recall.	7	Q. Do you recall what remarks Mr. Mariotti
9	Q. Finally, did anybody ever tell you that	8	said Mr. Libutti had made? Do you recall the
10	Mr. Sciarresi had described how discriminatory	9	contents of any?
11	practices Impacted your employment with Alitalia?	10	A. No.
12	A. I don't recall if my attorney at the time	11	Q. You said before that Mariotti was not the
13	had made a comment or not.	12	only one who reported to you that Libutti had made
14	Q. "At the time" you mean Mr. Behrins?	13	racist remarks?
15	A. Yes, I do.	14	A. Yes.
16	Q. Since he was your attorney, don't tell me	15	Q. Who else did?
17	anything further about what he said because I'm not	16	A. Francesco Gallo.
18	supposed to ask and you're not supposed to tell.	17	Q. Gallo said so?
19	What is your basis for stating in	18	A. Mm-hm.
20	paragraph 10 that Mr. Libutti repeatedly made racist	19	Q. Did you ever hear Gallo make racist
21	remarks?	20	remarks, by the way --
22	A. Mostly through conversations with Gabriele	21	A. No.
23	Mariotti.	22	Q. -- of his own?
24	Q. You never heard Mr. Libutti make a racist	23	A. No.
25	remark; is that right?	24	Q. What remarks did Mr. Gallo report to you
		Page 123	Page 125
1	LORUSSO		
2	A. I may have, but I don't recall.	1	LORUSSO
3	Q. Did anybody ever tell you that Mr.	2	Libutti made that he regarded as racist?
4	Libutti repeatedly made racist remarks?	3	A. I don't recall.
5	A. Gabriele Mariotti.	4	Q. Did Gallo mention which races Libutti was
6	Q. Just Mariotti. Did he describe any	5	making remarks about that you can recall?
7	remarks to you?	6	A. I can't recall.
8	A. It's not just Gabriele Mariotti, by the	7	Q. Did anybody other than Mariotti report to
9	way.	8	you that Libutti made sexist remarks?
10	Q. Let's finish with him and we'll go on to	9	A. Francesco Gallo.
11	whoever else it was.	10	Q. Did Mr. Gallo give you any specific sexist
12	Did Mr. Mariotti describe any of these	11	remarks that Mr. Libutti allegedly made?
13	remarks to you or repeated them?	12	A. I can't recall.
14	A. He may have.	13	Q. You said that Mr. Libutti participated in
15	Q. You don't recall anything specific?	14	discriminatory employment decisions and policies
16	A. I don't recall anything specific.	15	that adversely impacted you.
17	Q. But you recall his saying in general	16	Let me ask, first, did Mr. Libutti
18	terms, Libutti makes racist remarks?	17	participate in any decision to terminate you that
19	A. Yes.	18	you are aware of?
20	Q. Any races in particular that Mr. Mariotti	19	A. To terminate me?
21	claimed Mr. Libutti was making remarks about?	20	Q. Yes.
22	A. I don't recall.	21	A. He started the chain of events that led to
23	Q. This also says that Libutti, "upon	22	my termination.
24	information and belief Libutti repeatedly made	23	Q. Did Mr. Libutti have anything to do with
25	sexist remarks."	24	the Cargo department?
		25	A. I believe Mr. Libutti was no longer

32 (Pages 122 to 125)

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Ester Lorusso

12/19/2007

		Page 126	Page 128
1	LORUSSO		
2	employed, at the time.		
3	Q. But first answer my question which has to		
4	do, Mr. Libutti have anything to do with the Cargo		
5	department?		
6	A. No.		
7	Q. Do you know if Mr. Libutti was the person		
8	who arranged for you to get a job in the Cargo		
9	department in 2006?		
10	A. No.		
11	Q. Do you know whether he had any influence		
12	on that placement, I'll call it, or on that job		
13	opportunity?		
14	A. I don't know.		
15	Q. As you mentioned, Mr. Libutti was, in		
16	fact, no longer employed at Alitalia at the time of		
17	your termination, correct?		
18	A. That is correct. I believe that's		
19	correct.		
20	Q. He certainly was no longer in New York at		
21	the time, correct?		
22	A. Right.		
23	Q. You said earlier that Mr. Libutti said --		
24	I don't want to put words in your mouth -- but		
25	essentially set in motion the chain of events that		
		Page 127	Page 129
1	LORUSSO		
2	led to your termination?		
3	A. That's correct.		
4	Q. What are you referring to specifically?		
5	A. Mr. Libutti step-by-step was taking away		
6	my responsibilities and giving them to my male		
7	counterpart.		
8	Q. You mean Tim O'Neill?		
9	A. Tim O'Neill.		
10	Q. And so you consider that is how Mr.		
11	Libutti --		
12	A. -- began --		
13	Q. -- began the process of your termination?		
14	A. Correct.		
15	Q. The first thing he did was to promote you		
16	to GA2000, correct?		
17	MS. KURZON: Objection to the term		
18	"promote." Transferred?		
19	Q. Weren't you promoted to GA2000?		
20	A. I was transferred to G A 2000.		
21	Q. What was your salary before you went to		
22	GA2000?		
23	A. Eighty thousand.		
24	Q. What was your salary when you were at		
25	GA2000?		

33 (Pages 126 to 129)

Ester Lorusso

12/19/2007

	Page 130	Page 132
1 LORUSSO		
2 A. Only for the first few months.	1 LORUSSO	2 Q. You continued on your managing director
3 Q. Only for the first few months?		3 salary until you took your position in Cargo in
4 A. Right.		4 April of 2006?
5 Q. What happened after that?		5 A. That's correct.
6 A. The company was systematically being ignored		6 Q. If you look at the very last page of this
7 by Alitalia. There were a lot, a lot of problems		7 exhibit you'll see what appears to be a news clip
8 and it was quite obvious about the direction it was		8 mentioning you as a manager of marketing
9 headed.		9 communications at Alitalia, Ms. Lorusso.
10 Q. That was within the first few months?	10 A. Yes.	10 A. Yes.
11 A. Yes.		11 Q. Do you recall what publication this is
12 Q. How many employees did you supervise or,		12 from?
13 were there in GA2000, is probably a better way to		13 A. Travel Agent Magazine.
14 put it?		14 Q. The date is obscure. Do you recall the
15 A. Between 16 and 18.		15 date?
16 Q. Sixteen and 18?		16 A. No, I don't.
17 A. I believe so.		17 Q. It was in 1997 perhaps?
18 Q. They didn't all report directly to you, I		18 A. Could be.
19 assume. There were some supervisors and managers		19 Q. You were named one of the -- I can't
20 and so on?		20 remember the exact title, but one of the
21 A. That is correct.		21 up-and-coming women in travel around that time, as
22 Q. But the total head count for GA2000 was in		22 well?
23 the range from 16 to 18?		23 A. That's correct.
24 A. Yes. I believe I reduced it when I got		24 Q. This was the only document that your
25 there, but it was around that range.		25 attorneys produced to us at the time, in July when
	Page 131	Page 133
1 LORUSSO		
2 Q. Was that a decision that you made	1 LORUSSO	2 this document was given to us. Subsequently other
3 yourself?		3 documents were produced, but just last week we were
4 A. Yes.		4 sent over 350 pages of documents which your
5 Q. You selected the people to be terminated?		5 attorneys represented to us you had just turned over
6 A. Yes.		6 to them.
7 Q. These were job eliminations?		7 Is that correct?
8 A. I don't recall.		8 A. That's correct.
9 Q. Did you fire some people for just poor		9 Q. Where did those documents come from, the
10 performance?		10 350 that you gave your attorneys last week?
11 A. It may have been, but I don't recall. I		11 A. I had them.
12 would need to take a look at my notes.		12 Q. At home?
13 Q. Well, we'll get back into GA2000 later.		13 A. Yes.
14 Isn't it true that your salary at GA2000		14 Q. Why did you not turn them over to your
15 was, in fact, continued by Alitalia? That it wasn't		15 attorneys sooner?
16 paid by GA2000?		16 A. I didn't know that I had to turn over
17 A. That's correct.		17 every document that I had.
18 Q. You remained an Alitalia employee --		18 MS. KURZON: I object to this questioning
19 A. Yes, I did.		19 to the extent it calls for attorney-client
20 Q. -- while you were at GA2000?		20 privilege.
21 Isn't it true that after GA2000 was		21 MR. KORAL: Well, I am not asking her what
22 closed, which I think was maybe November 1, 2006 --		22 you told her to do or what she told you. I'm
23 A. Correct.		23 just asking why were they there that long.
24 Q. 2005?		24 Q. The answer is you didn't understand that
25 A. Five.		25 you should turn over documents?

34 (Pages 130 to 133)

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Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 146</p> <p>1 LORUSSO</p> <p>2 Q. Around the country to find --</p> <p>3 A. Not around the country, no.</p> <p>4 Q. Just around New York?</p> <p>5 A. Yes.</p> <p>6 Q. Why did you hate the job?</p> <p>7 A. It was a concept that was incredibly tough</p> <p>8 for people to grab.</p> <p>9 Q. So it was a hard sale?</p> <p>10 A. It was an extremely hard sale.</p> <p>11 Q. Were there other people involved in sales</p> <p>12 besides yourself? Sales for Hanger, I mean.</p> <p>13 A. Yes.</p> <p>14 Q. Were they more successful than you at</p> <p>15 making these hard sales?</p> <p>16 A. No.</p> <p>17 Q. Was the company not making money at this</p> <p>18 point?</p> <p>19 A. No.</p> <p>20 Q. It's not?</p> <p>21 A. No, it's not.</p> <p>22 MR. KORAL: Well, any documentation that</p> <p>23 we have of any of her job searches from the</p> <p>24 time she started while still at Alitalia until</p> <p>25 her -- until the present, really, I think would</p>	<p style="text-align: right;">Page 148</p> <p>1 LORUSSO</p> <p>2 qualifications of any persons hired by Alitalia for</p> <p>3 the jobs listed in paragraph 4G above, and give the</p> <p>4 basis for your belief."</p> <p>5 Now let's look at paragraph 4G, which is</p> <p>6 on the proceeding page. The first one is vice</p> <p>7 president of regulatory affairs. There are four</p> <p>8 jobs, actually, listed there, vice president of</p> <p>9 regulatory affairs, director of regulatory affairs,</p> <p>10 either of the two positions in marketing and sales</p> <p>11 that opened in 2006 as alleged in paragraph 43 of</p> <p>12 the complaint. Those positions.</p> <p>13 Let me ask you first, the positions in</p> <p>14 marketing and sales that opened up, can you tell me</p> <p>15 which those were? And if you want, we can look at</p> <p>16 the complaint which is on the next exhibit.</p> <p>17 I'll just read you paragraph 43 for now</p> <p>18 which is, "two positions in plaintiff's area of</p> <p>19 expertise, marketing and sales, opened up." Now,</p> <p>20 this appears to be in the fall of 2006.</p> <p>21 Do you know which two positions you are</p> <p>22 referring to?</p> <p>23 A. Yes. One is the position given to Lucia</p> <p>24 Alla. I don't recall the exact title of her</p> <p>25 position.</p>
<p style="text-align: right;">Page 147</p> <p>1 LORUSSO</p> <p>2 be relevant. I'd like to see. So we'll make</p> <p>3 that document request.</p> <p>4 We're going to mark now as Defendant's</p> <p>5 Exhibit 2 plaintiff's response to defendant's</p> <p>6 first interrogatories.</p> <p>7 (Defendant's Exhibit 2, response, was</p> <p>8 marked for identification as of this date.)</p> <p>9 Q. Ms. Lorusso, have you had an opportunity</p> <p>10 to look through this?</p> <p>11 A. Yes.</p> <p>12 Q. Is that your signature on the very last</p> <p>13 page of this document?</p> <p>14 A. Yes.</p> <p>15 Q. Did you read through this document on</p> <p>16 September 11, 2007?</p> <p>17 A. Yes.</p> <p>18 Q. Do you recall that you agreed with</p> <p>19 everything that was there?</p> <p>20 A. Yes.</p> <p>21 Q. I have just a few questions about this</p> <p>22 document.</p> <p>23 On page 35 we have interrogatory number 6.</p> <p>24 "Please identify each person whom you know or</p> <p>25 believe has knowledge or information concerning the</p>	<p style="text-align: right;">Page 149</p> <p>1 LORUSSO</p> <p>2 Q. Okay. Is that in marketing or sales?</p> <p>3 A. Marketing.</p> <p>4 Q. And what's the other? What is the sales</p> <p>5 position that opened up?</p> <p>6 A. The sales position was the director of</p> <p>7 sales.</p> <p>8 Q. Who got that position?</p> <p>9 A. The name slips my mind -- oh, Nicola</p> <p>10 Arneese.</p> <p>11 Q. Nicola is a man?</p> <p>12 A. I think that's his name.</p> <p>13 Q. Arneese is A-R-N-E-S-E, correct?</p> <p>14 A. Yes. That's correct.</p> <p>15 Q. Do you know when the position that went to</p> <p>16 Lucia Alla opened up?</p> <p>17 A. The exact date? No.</p> <p>18 Q. Around when?</p> <p>19 A. It was after Gabriele Mariotti left.</p> <p>20 Q. Which was around October of 2006, correct?</p> <p>21 A. That's correct.</p> <p>22 Q. This was a replacement for Mr. Mariotti?</p> <p>23 A. I believe the position was reclassified or</p> <p>24 the responsibilities may have changed.</p> <p>25 Q. Mr. Mariotti was in charge of customer</p>

38 (Pages 146 to 149)

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Ester Lorusso

12/19/2007

	Page 150	Page 152	
1 LORUSSO 2 service as well as pricing? 3 A. Yes. 4 Q. Is either of those a marketing position? 5 A. Well, customer relations was under me so 6 it was definitely a marketing position. 7 Q. Was under you when? 8 A. When I was the director of marketing. 9 Q. For how long? 10 A. Three years. 11 Q. Lucia Alla is a female? 12 A. Yes. 13 Q. Do you know her approximate age? 14 A. About 50. 15 Q. Approximately your age? 16 A. Approximately my age. 17 Q. Do you know what her experience was at 18 Alitalia? 19 A. She was the sales manager. 20 Q. Had she been at Alitalia a long time? 21 A. I believe she has. 22 Q. As long as you, as far as you know? 23 A. I don't think so. I don't know. 24 Q. As sales manager, what kind of sales -- 25 did she have a specific niche as sales manager?		1 LORUSSO 2 VIDEOGRAPHER: One minute. 3 MR. KORAL: We are going to have to go off 4 the record for a minute because the tape is 5 out. 6 VIDEOGRAPHER: The time is now 1:02 p.m. 7 This concludes tape number 2 of the videotape 8 deposition of Ms. Ester Lorusso. 9 (A break was taken.) 10 VIDEOGRAPHER: This is tape number 3 of 11 the videotape deposition of Ms. Ester Lorusso. 12 The time is now 1:04 p.m. We're back on 13 the record. 14 Q. What is the basis for your information 15 that Ms. Alla does not have the same job 16 responsibilities that Mr. Mariotti had? 17 A. I don't believe -- repeat your question. 18 Q. What's the basis for your belief that Ms. 19 Alla does not have the same position that Mr. 20 Mariotti had? 21 A. I thought they had changed the 22 responsibilities, but I'm not sure. 23 Q. Did anybody tell you that? 24 A. I don't recall. 25 Q. You never discussed it with Lucia Alla,	
1 LORUSSO 2 A. I believe it was -- to the best of my 3 knowledge it was corporate sales. 4 Q. And that was her position prior to 5 becoming whatever she became in marketing that you 6 felt you were qualified for? 7 A. That is correct. 8 Q. Did you talk to anybody about that 9 position in marketing? 10 A. Yes, I did. 11 Q. To whom? 12 A. To my boss at the time. 13 Q. Your boss at the time was whom? 14 A. Walter Longo. 15 Q. What did Walter Longo say? 16 A. I don't recall. 17 Q. He was, of course, in the Cargo Division, 18 correct? 19 A. Correct. 20 Q. Did you speak to anybody in the Passenger 21 Division about that? 22 A. No, I did not. 23 Q. Did you speak to anybody in HR about Lucia 24 Alla's position? 25 A. No, I did not.	Page 151	1 LORUSSO 2 did you? 3 A. No, I did not. 4 Q. And Mr. Mariotti was gone, so you couldn't 5 have discussed it with him, correct? 6 A. Yes. That's correct. 7 Q. Do you recall discussing it with anybody? 8 A. No. 9 Q. I am told that her title was director of 10 sales and marketing coordination which I understand 11 is the same title that Mr. Mariotti had. 12 Do you have any information that Mr. 13 Mariotti had a different title? 14 A. When I was the director of marketing he 15 did have a different title, so that was changed 16 afterwards. 17 Q. That was in 2004? 18 A. Right. 19 Q. Are you aware whether Mr. Mariotti got a 20 promotion in May of 2006? 21 A. I'm not aware. 22 Q. Had he previously been responsible for 23 customer relations? 24 A. Who? 25 Q. Mariotti, prior to May of 2006.	Page 153

39 (Pages 150 to 153)

Ester Lorusso

12/19/2007

	Page 154	Page 156
1 LORUSSO		
2 A. I don't know.	1 LORUSSO	2 A. Yes. He does or she does.
3 Q. Now, the job given to Nicola Arnes, you		3 Q. On travel agencies?
4 said this was called director of sales?		4 A. That is one of the accounts.
5 A. That's correct.		5 Q. What other kinds of accounts does the
6 Q. And you felt you qualified for that job?		6 director of sales make calls on?
7 A. Yes.		7 A. Corporations.
8 Q. What was your background, managerial		8 Q. All right. Anything else?
9 background in sales?		9 A. That about covers it for that position.
10 A. Managing director of GA2000.		10 Q. Are these the same kind of travel agencies
11 Q. You consider that a sales position?		11 that GA2000 calls on?
12 A. Yes, I do.		12 A. Yes.
13 Q. Prior to going into GA2000, what was your		13 Q. The same?
14 experience with sales?		14 A. Part of them, yes.
15 A. Well, marketing is an extension of sales.		15 Q. Wasn't the major business of GA2000 ethnic
16 Q. In your opinion marketing and sales --		16 sales?
17 marketing is an extension of sales?		17 A. Yes. Some of those agencies also sold
18 A. Well, they work hand in hand. We tried		18 leisure sales.
19 not to have separate departments saying this is just		19 Q. But the primary focus of the director of
20 marketing and that's just sales.		20 sales is on leisure sales, correct, or agencies that
21 Q. But as director of marketing you were		21 focus on leisure sales?
22 primarily involved with advertising, weren't you?		22 A. Repeat that question, please.
23 A. Advertising, customer relations, I needed		23 (Testimony was read back.)
24 to interact with sales so we can work with them and		24 A. Yes.
25 provide for their needs.		25 Q. Wasn't Mr. Farrow primarily responsible
	Page 155	Page 157
1 LORUSSO		
2 Q. You interacted with sales?		1 LORUSSO
3 A. Yes, of course.		2 for ethnic sales at GA2000?
4 Q. Had you held any management position in		3 A. Yes.
5 sales prior to GA2000?		4 Q. Mr. Farrow remained on the Alitalia
6 A. No.		5 payroll the way you did?
7 Q. And you regarded the GA2000 as primarily a		6 A. Yes.
8 sales position?		7 Q. What happened to Mr. Farrow after GA2000
9 A. Yes, sir.		8 closed?
10 Q. Wasn't it an executive position, managing		9 A. I believe he accepted a retirement
11 people?		10 package.
12 A. We were in the business of selling		11 Q. Do you know when he terminated?
13 tickets, so it was a sales --		12 A. I don't recall.
14 Q. Did you make sales calls?		13 Q. If I told you that it was the end of 2006,
15 A. Yes, I did.		14 would you have any reason to doubt that?
16 Q. With what frequency?		15 A. No.
17 A. Oh, I would say a few times a week.		16 Q. All right. Now, looking now at your
18 Q. All right. You were making sales calls on		17 response to interrogatory 6 which, remember, asks
19 whom, on what kind of businesses?		18 about people with information regarding the
20 A. Travel agencies.		19 qualifications of anyone hired by Alitalia for any
21 Q. Do you know what the director of sales		20 of the four jobs we were talking about, the director
22 position involves?		21 of sales, Lucia Alla's position, the director of
23 A. Yes, I do.		22 regulatory affairs and the vice president of
24 Q. Does the director of sales make sales		23 regulatory affairs.
25 calls?		24 Does Dursun Oksus have any information
		25 regarding the qualifications of Nicola Arnes?

40 (Pages 154 to 157)

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Ester Lorusso

12/19/2007

	Page 158	Page 160
1 LORUSSO		
2 A. No.	1 LORUSSO	
3 Q. Does he have any information regarding the	2 Q. Frustration for what reasons? Did he give	
4 qualifications of Lucia Alla, as far as you know?	3 any?	
5 A. No.	4 A. Yes. He said that he was incompetent.	
6 Q. So why is Dursun Oksus's name here?	5 Q. Did he say anything else?	
7 A. Because he has the information regarding	6 A. He was really incompetent.	
8 the vice president, VP of regulatory affairs.	7 Q. As in very incompetent?	
9 Q. Because he got that job?	8 A. Extremely incompetent.	
10 A. Yes.	9 Q. Did he give you examples of that?	
11 Q. What information do you believe he has	10 A. I believe he did.	
12 about the qualifications or his qualifications for	11 Q. This was just by way of conversation?	
13 VP of regulatory affairs?	12 A. Yes.	
14 A. Information regarding the scope of the	13 Q. This occurred, of course, after Mr. Oksus	
15 work.	14 became vice president of regulatory affairs?	
16 Q. Okay. Did you ever discuss with him	15 A. That is correct.	
17 whether he had any idea about the scope of the work	16 Q. Which was approximately March of 2007?	
18 of the VP of regulatory affairs?	17 A. No.	
19 A. No.	18 Q. 2006. I'm sorry.	
20 Q. Did you ever discuss that with anybody,	19 A. That's okay.	
21 apart from what you testified about the rumors and	20 Q. March of 2006. That wasn't intentional.	
22 so on?	21 A. I understand. Yes.	
23 A. Yes.	22 Q. You started in Cargo in April of 2006,	
24 Q. All right. With whom?	23 right?	
25 A. One was Eugene Massimillo.	24 A. That's correct.	
	25 Q. Did you have any business reason to be	
1 LORUSSO	Page 159	Page 161
2 Q. Who was Eugene Massimillo?	1 LORUSSO	
3 A. He is an attorney for -- I can't remember	2 talking to Mr. Massimillo while you were in Cargo?	
4 the name of the law firm. I'm sorry.	3 A. I don't think so.	
5 Q. Is it a law firm that Alitalia uses?	4 Q. But you had conversations with him about	
6 A. Yes.	5 Mr. Oksus anyway. Is that fair?	
7 Q. It's the law firm that handles regulatory	6 A. Yes. I did have a business reason. I	
8 matters for Alitalia?	7 remember one day he called me because he had	
9 A. That is correct.	8 something in Italian that he wanted to know -- from	
10 Q. How did you come to have this conversation	9 Alitalia and he wanted to know if I would give him a	
11 with Eugene Massimillo?	10 hand with it as far as translation or as far as what	
12 A. He would speak on a pretty regular basis.	11 the meaning was.	
13 We had worked pretty closely because when I was in	12 Q. Mr. Massimillo doesn't speak Italian?	
14 charge of customer relations we had a lot of	13 A. That's correct.	
15 interaction. So in these conversations, these	14 Q. He doesn't have people in his office who	
16 telephone conversations, the matter would arise	15 speak Italian, as far as you know?	
17 about Dursun Oksus.	16 A. As far as I know.	
18 Q. This was before you were in Cargo or while	17 Q. Have you done this for him before?	
19 you were in Cargo or both?	18 A. No.	
20 A. I don't recall.	19 Q. He kind of picked on you now?	
21 Q. What do you recall about your	20 A. No. We were friendly, as I mentioned. We	
22 conversations with Mr. Massimillo about Dursun	21 were friendly.	
23 Oksus?	22 Q. When was the last time you spoke with him?	
24 A. He expressed frustration in working with	23 A. A few months ago.	
25 Mr. Dursun.	24 Q. What was the occasion of doing so?	
	25 A. He called me to say hi.	

41 (Pages 158 to 161)

Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 162</p> <p>1 LORUSSO 2 Q. Did you discuss your lawsuit at all? 3 A. No. 4 Q. Have you ever discussed your lawsuit with 5 Mr. Massimillo? 6 A. No. 7 Q. Have you ever discussed your belief that 8 you were discriminated against with Mr. Massimillo? 9 A. Yes. 10 Q. When did you do that? 11 A. I don't recall. 12 Q. Was it in connection with Mr. Oxsus's 13 appointment? 14 A. Yes. 15 Q. Did you ever speak with Mr. Massimillo 16 about your feeling about discrimination at any time 17 other than about Mr. Oxsus's appointment? 18 A. It could be. 19 Q. Did you ever speak with Franco Gallo about 20 your belief that it was discrimination against you 21 when Oksus was appointed vice president of 22 regulatory affairs? 23 A. I remember bringing up the subject with 24 him and I remember being immediately dismissed. In 25 other words, he did not want to have the</p>	<p style="text-align: right;">Page 164</p> <p>1 LORUSSO 2 incompetence? 3 A. I don't recall. 4 Q. Okay. 5 A. I don't recall. 6 Q. What qualifications did you believe you 7 had for the job of vice president of regulatory 8 affairs? 9 A. I was in charge of customer relations and 10 based on that, that's why I believed I had the 11 qualifications. 12 Q. Do you know what the vice president of 13 regulatory affairs does? 14 A. Yes. 15 Q. Pardon? 16 A. Yes. 17 Q. What does the vice president of regulatory 18 affairs do? 19 A. Deals with government agencies, makes sure 20 the airline is doing the right thing. 21 Q. That is the FAA? 22 A. That is correct. 23 Q. Any other government agencies? 24 A. I can't recall right now. 25 Q. Homeland Security?</p>
<p style="text-align: right;">Page 163</p> <p>1 LORUSSO 2 conversation. 3 Q. Did he walk away? 4 A. I don't recall. 5 Q. You don't recall how you got dismissed? 6 A. Yes. 7 Q. He didn't yell and scream at you, though? 8 A. No. 9 Q. He just shut down -- 10 A. Yes. 11 Q. -- the discussion? Did Mr. Massimillo 12 give any examples of Dursun Oxsus's incompetence? 13 And by that I mean things Oksus had done that a vice 14 president of regulatory shouldn't have done? 15 A. A silly thing comes to mind right now 16 where he kept referring to him in writing as Jene 17 Massimillo, J-E-N-E, rather than his name, Gene, 18 G-E-N-E. 19 Q. His name is probably Eugene, actually? 20 A. It is Eugene but everyone knows him as 21 Gene. Apparently Dursun was working with him for a 22 while and he still kept writing to him as J-E-N-E. 23 Q. That bugged him? 24 A. Yes. 25 Q. But you don't recall any other examples of</p>	<p style="text-align: right;">Page 165</p> <p>1 LORUSSO 2 A. Yes. 3 Q. Any others? 4 A. I can't recall -- Immigration. 5 Q. I think that's part of Homeland Security 6 right now. 7 Anyway, do you have any background in 8 dealing with immigration? 9 A. Yes, because of the fines we used to get 10 and they used to come to the customer relations 11 office. 12 Q. Fines from whom? 13 A. When the ticket agents at the airports did 14 not properly check documentation. 15 Q. You mean -- 16 A. -- passports that expired, so on and so 17 forth. 18 Q. Okay. 19 A. The airline would get fined. 20 Q. By FAA? 21 A. Correct. By whichever government agency 22 it was at the time, and the fines would come through 23 our office. 24 Q. Did you actually deal with any government 25 agencies as a result of that?</p>

42 (Pages 162 to 165)

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Ester Lorusso

12/19/2007

	Page 166	Page 168
1	LORUSSO	
2	A. No.	
3	Q. You mean they just were processed through	
4	your office?	
5	A. Correct. So we would see what they were	
6	regarding and so on and so forth.	
7	Q. So this is your experience with	
8	Immigration?	
9	A. Right.	
10	Q. What about with the FAA? Did you have any	
11	experience with them?	
12	A. No.	
13	Q. Did Mr. Massimillo ever tell you he	
14	thought you were qualified for VP of regulatory	
15	affairs?	
16	A. Yes.	
17	Q. He said so?	
18	A. Yes.	
19	Q. He doesn't appear on any list that you've	
20	given us of potential witnesses.	
21	A. Can I clarify that a bit?	
22	Q. Okay. I think you better. Go ahead.	
23	A. In regards to Dursun getting the job, I	
24	was qualified to getting the position.	
25	Q. Meaning, you weren't necessarily qualified	
	Page 167	Page 169
1	LORUSSO	
2	but you were better qualified than Dursun?	
3	A. That is correct.	
4	Q. Your basis for saying that is your work in	
5	customer relations?	
6	A. Yes.	
7	Q. And your fluency in English?	
8	A. Yes.	
9	Q. Anything else?	
10	A. I had gone through a crisis management	
11	course --	
12	Q. Okay.	
13	A. -- a few years ago.	
14	Q. Did you ever discuss Dursun Oksus's	
15	appointment with Orlando D'Oro?	
16	A. Yes.	
17	Q. When did you do that?	
18	A. I don't recall.	
19	Q. Was it around the time that Dursun Oksus	
20	was appointed?	
21	A. Yes.	
22	Q. What did Mr. D'Oro say?	
23	A. He was in disbelief that Dursun got the	
24	position.	
25	Q. Did he give any reason for his disbelief?	

43 (Pages 166 to 169)

Ester Lorusso

12/19/2007

	Page 190	Page 192
1	LORUSSO	LORUSSO
2	A. No, not my notes. Perhaps your notes.	A. Yes.
3	Q. Oh, we've given you what we have.	Q. So he didn't criticize the advertising --
4	You think that Mr. -- somebody told you,	A. In other words, he came to the States and
5	you don't remember who, that Mr. Pausini changed the	said, This is the way we used to do it in Argentina.
6	review?	This is the way it should be done. This is the way
7	A. Yes. I believe he came to New York to do	we did it in Argentina.
8	it.	Q. Did you change the way you were doing
9	Q. He came to New York to change the review?	things to conform to what Mr. Libutti wanted?
10	A. Yes. One of the reasons why he was in New	A. I think I tried to appease him with
11	York.	certain things, yes.
12	Q. Because he had already been transferred	Q. With certain things?
13	back to Rome?	A. Yes.
14	A. Yes.	Q. But he continued to feel that he wanted it
15	Q. And Mr. Libutti was in charge here,	done differently?
16	correct?	A. Yes.
17	A. Yes.	Q. Paragraph 18 continues, "He made it clear
18	Q. Paragraph 18 says that "Mr. Libutti was	that women" -- clear to you, I'm sorry -- "that
19	immediately dismissive of plaintiff."	women were not meant to serve in executive
20	In what ways was Mr. Libutti dismissive of	capacities."
21	you immediately?	How did he do that?
22	A. He basically wanted to know about our	A. By taking parts of my job away and giving
23	advertising practices and made it clear to me that	them to Tim O'Neill.
24	that wasn't the way things should be done.	Q. What parts were those?
25	Q. Okay. Can you think of any specific	A. Yearly sales meeting.
1	LORUSSO	LORUSSO
2	examples where he didn't like the way things were	Q. You used to run a yearly sales meeting?
3	being done?	A. The organization of the yearly sales
4	A. I can't think of anything specific right	meeting, yes.
5	now.	Q. You organized it?
6	Q. Did Mr. Libutti continue during the time	A. Yes.
7	he remained as director in marketing in the	Q. Whom did he give that to?
8	Passenger Division that he didn't like the way the	A. Tim O'Neill.
9	advertising was being done?	Q. Who?
10	A. Excuse me?	A. Tim O'Neill.
11	Q. Did Mr. Libutti continue to make it clear	Q. Tim O'Neill, who was in sales?
12	to you that he didn't like the way the advertising	A. Who was a fellow director.
13	was being done as long as you remained in Passenger?	Q. Tim O'Neill's title was sales and
14	A. Mr. Libutti was negative about anything	alliance --
15	that had to do with me, so it's hard to pinpoint	A. -- coordination.
16	whether he continued or he didn't continue.	Q. -- coordination?
17	Q. Did he continue, for example, to criticize	A. That's correct.
18	the advertising?	Q. The alliance referred to, by the way, just
19	A. He didn't continue to criticize the	so we were clear, that's the Sky Team alliance with
20	advertising. He would continue to criticize	Delta and other airlines?
21	anything I had to do.	A. That's correct.
22	Q. Well, advertising was a big --	Q. Air France, I think.
23	A. With the advertising.	Other than taking some of your
24	Q. Advertising was a big part of what you	responsibilities away, such as the yearly sales
25	did, correct?	meeting, how else did he make it clear to you that

49 (Pages 190 to 193)

Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 194</p> <p>1 LORUSSO 2 women didn't belong in executive positions? 3 A. By giving me menial tasks. 4 Q. Mr. Libutti gave you menial tasks? 5 A. Yes. 6 Q. Such as? 7 A. I recall one day he came in with shopping 8 bags full of his home videos that he wanted 9 transferred to DVDs. 10 Q. Yes? 11 A. And he handed them to me so that I could 12 get them done for him. 13 Q. So that you could get them done for him 14 where? 15 A. At our ad agency. 16 Q. So it was the ad agency would did that, 17 correct? 18 A. They expected them to do that. 19 Q. He didn't ask you to do it. 20 A. He asked me to ask them to do it. 21 Q. And you were the liaison to the ad agency. 22 Wasn't that your principal job? 23 A. Yes. At no cost, I might add. 24 Q. Okay. The ad agency refused? 25 A. I don't know what happened because I gave</p>	<p style="text-align: right;">Page 196</p> <p>1 LORUSSO 2 clear to you that women were not meant to serve in 3 executive capacities. You said, one, he transferred 4 responsibilities away from you, one of it was the 5 sales meeting. What else? 6 A. We had a yearly symposium which my 7 department organized. He also gave that to Tim 8 O'Neill. 9 Q. Who in your department did the organizing 10 of that? 11 A. Elizabeth Santella. 12 Q. Elizabeth Santella? 13 A. Yes. 14 Q. What was her title at the time? 15 A. I believe it was sales promotion manager. 16 Q. Did Elizabeth -- 17 A. -- or marketing communications manager. I 18 don't recall at the time. 19 Q. Did he transfer Elizabeth Santella to 20 report to Tim O'Neill at that time? 21 A. No. 22 Q. What else did he take away from you? 23 A. The marketing component of the sales team 24 alliance. I used to handle that and then he wanted 25 Tim O'Neill to handle that.</p>
<p style="text-align: right;">Page 195</p> <p>1 LORUSSO 2 the bag -- I felt that I was in a compromising 3 position because I was the liaison to the ad agency. 4 So I handed the shopping bags to his secretary, to 5 his assistant, and I asked her to follow up on it. 6 Q. You told her to follow up on it? 7 A. I asked her to. 8 Q. You didn't do what Mr. Libutti asked, you 9 told his secretary to do what Mr. Libutti asked? 10 A. Mr. Libutti was asking me to do something 11 that was personal in nature and not business 12 oriented and he was asking me to do it without being 13 charged. So I really felt that I would be 14 compromising my position as the liaison between the 15 agency and Alitalia. 16 Q. Did you tell that to Mr. Libutti's 17 secretary? 18 A. What do you mean? 19 Q. Did you say to her, You better do this 20 because I feel my position would be compromised if I 21 give this to the ad agency? 22 A. I believe I did. 23 Q. Did you say it to Mr. Libutti? 24 A. I don't recall. 25 Q. Going back to ways in which he made it</p>	<p style="text-align: right;">Page 197</p> <p>1 LORUSSO 2 Q. When you say, "the sales team," you mean 3 the Sky Team alliance? 4 A. I'm sorry, the Sky Team alliance. 5 Q. So Tim started handling the marketing 6 component of Sky Team? 7 A. Yes. 8 Q. How much of your job did that involve? 9 A. I would say about 15 percent. 10 Q. Anything else you can think of that was 11 transferred? 12 A. No, but I did write to Libutti all of the 13 items that he was -- that concerned us. 14 Q. Okay. You complained about this to 15 Libutti? 16 A. Yes, I did. 17 Q. What's your basis for thinking it was 18 because you're a woman that he transferred these 19 things to Tim O'Neill? Do you have a basis for it? 20 A. I was the only woman, female director. 21 Q. Any other reason? 22 A. Probably that's because Libutti came with 23 the reputation of, you know, treating women as -- 24 not treating women well. 25 Q. He came with that reputation?</p>

50 (Pages 194 to 197)

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Ester Lorusso

12/19/2007

<p>1 LORUSSO</p> <p>2 passed on to us?</p> <p>3 A. Yes, of course.</p> <p>4 MS. KURZON: Or notes that you reviewed</p> <p>5 because they've been produced by Alitalia?</p> <p>6 THE WITNESS: Of course.</p> <p>7 Q. In paragraph 20 you say that he "shifted</p> <p>8 duties to a less experienced male colleague."</p> <p>9 Who was that? Was that Tim O'Neill?</p> <p>10 A. Yes, it is.</p> <p>11 Q. Less experienced in what way?</p> <p>12 A. In marketing.</p> <p>13 Q. What's Tim O'Neill's background? Sales?</p> <p>14 A. Yes.</p> <p>15 Q. Tim O'Neill is approximately your age or a</p> <p>16 little older?</p> <p>17 A. A little older.</p> <p>18 Q. Do you know if he came to the travel</p> <p>19 industry, the airline industry late in life?</p> <p>20 A. No.</p> <p>21 Q. As far as you know, that's what he's</p> <p>22 always done?</p> <p>23 A. Yes.</p> <p>24 Q. What tasks were given to Francesca Forte</p> <p>25 as alleged in paragraph 22?</p>	<p>Page 202</p> <p>1 LORUSSO</p> <p>2 Q. Do you know when that occurred?</p> <p>3 A. I don't remember at this time.</p> <p>4 Q. Were you still at GA2000 when she was</p> <p>5 transferred to Rome?</p> <p>6 A. I believe so.</p> <p>7 Q. Had you just begun in GA2000 when she was</p> <p>8 transferred to Rome?</p> <p>9 A. I don't remember.</p> <p>10 Q. And, as you said, they split up your</p> <p>11 responsibilities and gave them to different people?</p> <p>12 A. Yes.</p> <p>13 Q. Anybody besides Tim O'Neill and Francesca</p> <p>14 Forte?</p> <p>15 A. I believe Lisa Del Percio was doing a few</p> <p>16 things, and she was --</p> <p>17 Q. Lisa, L-I-S-A?</p> <p>18 A. Yes.</p> <p>19 Q. Del Persio.</p> <p>20 Do you recall anything specific that Lisa</p> <p>21 was doing that you had done?</p> <p>22 A. That my department had done? She was</p> <p>23 handling barter, promotional barter.</p> <p>24 Q. Was she a manager?</p> <p>25 A. No.</p>
<p>1 LORUSSO</p> <p>2 A. Francesca Forte was given the</p> <p>3 responsibility of advertising.</p> <p>4 Q. Francesca Forte got the responsibilities</p> <p>5 of advertising?</p> <p>6 A. Yes.</p> <p>7 Q. What was her position prior to your</p> <p>8 transfer to GA2000?</p> <p>9 A. I don't remember her title, but she</p> <p>10 reported to me.</p> <p>11 Q. Was she a manager?</p> <p>12 A. No.</p> <p>13 Q. She was an administrative assistant?</p> <p>14 A. I think her title had representative in</p> <p>15 it, the word "representative."</p> <p>16 Q. And she got the same responsibilities for</p> <p>17 advertising that you had had?</p> <p>18 A. Yes, she did. My work was split up.</p> <p>19 Q. Isn't it true that advertising was moved</p> <p>20 to Rome at this time, in 2004?</p> <p>21 A. Actually, it was supposed to have been</p> <p>22 moved to Rome, but I believe that first Francesca</p> <p>23 Forte was working on it in New York and then she was</p> <p>24 transferred along with the responsibility. She was</p> <p>25 transferred to Rome.</p>	<p>Page 203</p> <p>1 LORUSSO</p> <p>2 Q. Had she been doing that before you went to</p> <p>3 GA2000, under your supervision, I mean?</p> <p>4 A. No, no. She reported directly to Libutti.</p> <p>5 She was his assistant.</p> <p>6 Q. She was this assistant?</p> <p>7 A. Yes.</p> <p>8 Q. His administrative assistant?</p> <p>9 A. Yes.</p> <p>10 Q. So she got the administrative barter --</p> <p>11 pardon me, the promotional barter?</p> <p>12 A. Yes.</p> <p>13 Q. Can you think of anybody else that got</p> <p>14 some of your responsibilities?</p> <p>15 A. Not at this time.</p> <p>16 Q. Paragraph 24 states that you knew that</p> <p>17 GA2000 would soon close. Your testimony earlier was</p> <p>18 that you were concerned that it might close because</p> <p>19 Alitalia was closing subsidiaries.</p> <p>20 Did you have any specific knowledge that</p> <p>21 it would close or does "knew" here mean really</p> <p>22 suspected?</p> <p>23 A. I suspected.</p> <p>24 Q. You feared it?</p> <p>25 A. I feared it.</p>

52 (Pages 202 to 205)

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Ester Lorusso

12/19/2007

Page 206	Page 208
<p>1 LORUSSO</p> <p>2 Q. Twenty-eight states, "In or around the 3 summer of 2005, Mr. Libutti announced that the 4 company intended to rejuvenate the New York office 5 and get rid of the 'old faces.'"</p> <p>6 You say "announced." Was this at a 7 meeting?</p> <p>8 A. I don't recall.</p> <p>9 Q. Was this the statement that Mr. Mariotti 10 reported to you or are you thinking of something 11 specific? Something else, I mean.</p> <p>12 A. I believe it was the statement that 13 Mariotti reported to me.</p> <p>14 Q. So you never heard Libutti say this?</p> <p>15 A. No.</p> <p>16 Q. Paragraph 30 states that in October of 17 2005 you again complained of age and gender 18 discrimination.</p> <p>19 To whom did you make that complaint?</p> <p>20 A. I don't recall.</p> <p>21 Q. Do you recall whether it was in writing?</p> <p>22 A. I think I did put it in writing.</p> <p>23 Q. All right. I haven't seen -- I'll just 24 represent to you I have not seen anything in writing 25 between 2004 and, let's say, 2006. I haven't seen</p>	<p>1 LORUSSO</p> <p>2 anything, or, if so, what they said?</p> <p>3 A. Right.</p> <p>4 Q. Now, when GA2000 was closed, what happened 5 to the employees of GA2000?</p> <p>6 A. We let them go.</p> <p>7 Q. They were all terminated?</p> <p>8 A. They were all terminated.</p> <p>9 Q. What kind of severance did they get?</p> <p>10 A. Two weeks' salary.</p> <p>11 Q. Two weeks' salary, period?</p> <p>12 A. Yes.</p> <p>13 Q. And the only exceptions to that were 14 yourself, who was kept on, although you may not have 15 had responsibilities to perform, and Mr. Farrow who 16 took early retirement?</p> <p>17 A. Right. And the two of us were employed by 18 Alitalia and all the employees that were terminated 19 were employed by GA2000.</p> <p>20 Q. Those employees were quite young, weren't 21 they, for the most part?</p> <p>22 A. The GA2000 employees?</p> <p>23 Q. Yes.</p> <p>24 A. It was mixed.</p> <p>25 Q. Mixed?</p>
<p>1 LORUSSO</p> <p>2 an October 2005 complaint.</p> <p>3 I just wonder, do you remember whether it 4 was in writing?</p> <p>5 A. No. I don't remember.</p> <p>6 I believe that October 2005 was when I was 7 told that GA2000 was closing, therefore I, most 8 probably, said at that time to Libutti and Gallo 9 that this was done on purpose.</p> <p>10 Q. You don't have a specific recollection of 11 saying that to Libutti and Gallo?</p> <p>12 A. Yes. I did say it to them.</p> <p>13 Q. You have a specific recollection?</p> <p>14 A. I have a specific recollection.</p> <p>15 Q. Can you remember where that was said?</p> <p>16 A. It must have been in Libutti's office. I 17 am not certain.</p> <p>18 Q. You don't recollect that?</p> <p>19 A. I don't recollect that.</p> <p>20 Q. But you recollect saying it?</p> <p>21 A. Yes.</p> <p>22 Q. Do you recollect what reaction you got 23 from either one of them?</p> <p>24 A. No. I don't recollect.</p> <p>25 Q. You don't recall if either of them said</p>	<p>1 LORUSSO</p> <p>2 A. I think so.</p> <p>3 Q. They weren't mostly young, relatively 4 low-paid employees?</p> <p>5 A. They were low-paid employees and most of 6 them were hired through a temp agency.</p> <p>7 Q. You didn't do the hiring. They were in 8 place when you got there, correct?</p> <p>9 A. Most of them, yes.</p> <p>10 Q. Who was your predecessor as general 11 manager of GA2000?</p> <p>12 A. Jean-Paul.</p> <p>13 Q. Say it again.</p> <p>14 A. Jean-Paul. I don't know how to spell his 15 last name.</p> <p>16 Q. J-E-A-N, hyphen, P-A-U-L?</p> <p>17 A. Correct.</p> <p>18 Q. French name?</p> <p>19 A. Yes, or Belgian, I believe he was.</p> <p>20 Q. Can you pronounce his last name?</p> <p>21 A. Steurve, S-T-E-U-R-V-E. Something like 22 that.</p> <p>23 Q. He was general manager of GA2000 before 24 you took over?</p> <p>25 A. I don't know if that was his exact title,</p>

53 (Pages 206 to 209)

Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 210</p> <p>1 LORUSSO 2 but he was my predecessor. 3 Q. Do you have any idea what your salary was 4 compared to his? 5 A. No, I don't. 6 Q. Do you know why he left the job? 7 A. No, I don't. 8 Q. Did he stay with the company, do you know, 9 or did they transfer him somewhere else, or you 10 don't know what happened to him at all? 11 A. No. I believe he left the company. 12 Q. Do you know if he was fired? 13 A. I don't know the circumstances of his 14 leaving. 15 Q. Now, when you were general manager of 16 GA2000, who was your boss? 17 A. That's a good question. 18 Q. Thank you. Do you have any idea who your 19 boss was? 20 A. Indirectly, Libutti, and directly, 21 Francesco Gallo. 22 Q. Gallo was nominally president of GA2000? 23 A. That's correct. 24 Q. But he didn't have an office over there? 25 He didn't --</p>	<p style="text-align: right;">Page 212</p> <p>1 LORUSSO 2 A. That's correct. 3 Q. Which one was it? I shouldn't have asked 4 the question that way. 5 A. He approved. 6 Q. Formally or just informally? 7 A. Informally. 8 Q. You would tell him and he would say, yes, 9 good idea -- 10 A. Yes. 11 Q. -- that sort of thing? 12 Now 31 says you were placed alone on an 13 empty floor in the Empire State Building. 14 Was there really nobody else on the 36th 15 floor besides yourself after GA2000 closed? 16 A. I was eventually alone and it was 17 step-by-step. I don't recall at one point when the 18 other offices closed. 19 Q. GA2000 closed I think at the end of 20 October 2005. 21 A. Yes. 22 Q. And so for November, December, January, 23 February and March you were on 36 the whole time? 24 A. Yes. 25 Q. You didn't get moved to 37 at any point in</p>
<p style="text-align: right;">Page 211</p> <p>1 LORUSSO 2 A. No. 3 Q. Did Gallo, in fact, supervise you while 4 you were there? 5 A. Yes. 6 Q. Did he give you any evaluations? 7 A. No. 8 Q. In what ways did he supervise you? 9 A. He signed my vacation slips. 10 Q. That was it, pretty much? Well, if you 11 wanted to fire somebody -- I think you testified 12 that you fired a couple of people -- did you get 13 Gallo's permission or did you just do it and 14 informed him? 15 A. I believe I informed him of what I wanted 16 to do because what I found when I got to the company 17 was a lot of employees had very low salaries rather 18 than more quality employees at a bit higher salary. 19 So that's about the only adjustment I made 20 as far as the number of employees is concerned. 21 Q. But you say you made the adjustments, he 22 didn't make the adjustments? 23 A. That's correct. 24 Q. But he approved them or at least was kept 25 informed of them?</p>	<p style="text-align: right;">Page 213</p> <p>1 LORUSSO 2 that time? 3 A. That's correct. 4 Q. And then in April you started in Cargo, 5 and we'll get to that later. 6 In November, weren't there other people on 7 36? 8 A. I can't recall if the ticket office was 9 still open at the time. 10 Q. The ticket office was on 36, wasn't it? 11 A. Yes, it was. 12 Q. Of course they were out in the open, 13 correct? 14 A. No. They were in a separate office, 15 totally, on the 36th floor. 16 Q. A separate office with a separate door? 17 A. Yes. 18 Q. And you had your own office? 19 A. GA2000? 20 Q. Yes. 21 A. Yes. 22 Q. And it said GA2000 on the door? 23 A. That's correct. 24 Q. And those people all moved out and Farrow 25 retired and you were left alone in the GA2000</p>

54 (Pages 210 to 213)

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Ester Lorusso

12/19/2007

<p>1 LORUSSO 2 office? 3 A. Right. 4 Q. At some point the ticketing office closed? 5 A. Yes. 6 Q. But you don't know when? 7 A. I don't know when. I don't recall. 8 Q. All right. You write here that Gallo 9 found you -- that's 32 -- a position as director of 10 marketing and communications in Cargo. 11 How do you know that it was Gallo that did 12 that? 13 A. He communicated it to me in January. 14 Q. Do you know whether Walter Longo had 15 approved it? 16 A. I don't know. 17 Q. Do you know whether Libutti instructed 18 Gallo to find that job for you? 19 A. I don't know. 20 Q. All you know is that Gallo is the one that 21 told you we've got you a job in Cargo? 22 A. Correct. 23 Q. I think you've already testified about 24 your effort to -- your attempt to apply for the 25 regulatory affairs position?</p>	<p>Page 214</p> <p>1 LORUSSO 2 Q. And you told Mr. Porru that you felt that 3 your customer service experience gave you 4 qualification? 5 A. That's correct. 6 Q. Did he say anything? 7 A. Pardon me? 8 Q. Did he comment on that? 9 A. I don't recall. 10 Q. You've already testified you don't know 11 whether that position was ever filled. 12 A. Correct. 13 Q. But it wasn't filled by you in any case? 14 A. No, it wasn't. 15 Q. Did you ever contact Mr. Porru again about 16 that position? 17 A. I don't remember. 18 Q. By the way, isn't the IT office still on 19 the 36th floor? 20 A. I don't know. 21 Q. You don't know whether the IT office -- 22 wasn't it on the 36th floor the entire time you were 23 on the 36th floor? 24 A. Yes. On the other side of the building. 25 Q. But it was there?</p>
<p>1 LORUSSO 2 A. Yes. 3 Q. So we don't have to discuss that. 4 Are you sure that it was director of 5 regulatory affairs in February of 2006? That's 6 paragraph 38. Mr. Oksus got the job around then as 7 vice president, didn't he? 8 A. I don't recall. 9 Q. Who was it who told on November 7, 2006 10 that you'd have to interview for the director of 11 regulatory affairs job? That's paragraph 40. 12 A. I believe it was Mr. Porru. 13 Q. P-O-R-R-U. He's in the room. 14 Did he, in fact, interview you? 15 A. Yes. 16 Q. What do you recall about the interview? 17 A. It seemed to have gone well. 18 Q. Sorry? 19 A. It seemed to have gone well. 20 Q. What do you recall about it other than 21 your general impression that it went well? 22 A. That's all I recall about it. 23 Q. Do you recall discussing your experience 24 and qualifications in regulatory affairs? 25 A. Yes.</p>	<p>Page 215</p> <p>1 LORUSSO 2 A. Yes. 3 Q. Do you know any of the people in IT? 4 A. A few. 5 Q. Paragraph 44 is referring to the positions 6 we've already discussed in paragraph 33, namely 7 Lucia Alla's position and the position that went to 8 Nicola Arnese. 9 It says, "These position went to younger 10 and inexperienced workers while plaintiff was not 11 even allowed to interview for these positions." 12 First, Lucia Alla is not younger than you, 13 is she? 14 A. No. She is not. 15 Q. Nicola Arnese is? 16 A. Yes, he is. 17 Q. Lucia Alla is not an inexperienced worker, 18 correct? 19 A. No, she is not. 20 Q. Do you know what experience Mr. Arnese 21 has? 22 A. Let me go back to that. Inexperienced as 23 far as what the position entailed. Lucia Alla had 24 never handled customer relations before. That was a 25 huge component of the position.</p>

55 (Pages 214 to 217)

Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 218</p> <p>1 LORUSSO</p> <p>2 Q. Now, you said that you were -- first let 3 me say, Mr. Arnone, do you know anything about his 4 experience?</p> <p>5 A. I think he was with the company for about 6 a year and-a-half. He was about 33 years old and 7 came from a different country to the United States 8 for the first time to work.</p> <p>9 Q. Do you know whether he worked for 10 Lufthansa at any point in his career?</p> <p>11 A. I don't know.</p> <p>12 Q. Do you know whether he worked for any 13 other airline before he came to Alitalia?</p> <p>14 A. No.</p> <p>15 Q. Do you know what he did for Alitalia 16 during his year and-a-half with Alitalia in Europe 17 before he came to the U.S.?</p> <p>18 A. No. But this is basically along the same 19 line as the questions you were asking me concerning 20 Dursun. In comparison I believe I had stronger 21 qualifications.</p> <p>22 Q. But you don't know what his qualifications 23 were you just testified.</p> <p>24 A. Well --</p> <p>25 Q. The record will reflect whatever you</p>	<p style="text-align: right;">Page 220</p> <p>1 LORUSSO</p> <p>2 A. I think the timing was so short that I 3 didn't even get a chance to.</p> <p>4 Q. Really?</p> <p>5 A. Yes.</p> <p>6 Q. You think that Lucia Alla was appointed to 7 that Mariotti position within a matter of days?</p> <p>8 A. Yes.</p> <p>9 Q. Did you protest about that?</p> <p>10 A. I don't believe I did.</p> <p>11 Q. Whom did Mr. Arnone replace?</p> <p>12 A. He replaced Marco D'Ilario.</p> <p>13 Q. What happened to Mr. D'Ilario?</p> <p>14 A. I believe he went back to Rome.</p> <p>15 Q. All right. How long was that position 16 vacant, if you know, between the time Mr. D'Ilario 17 left and when Mr. Marquez came?</p> <p>18 A. I don't know.</p> <p>19 Q. Did you know that Mr. D'Ilario had left? 20 I mean, when Mr. D'Ilario had left you knew that his 21 job was open, correct?</p> <p>22 A. Yes, I believe so.</p> <p>23 Q. Did you talk to anybody about filling that 24 job?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 219</p> <p>1 LORUSSO</p> <p>2 testified about. That wasn't the question.</p> <p>3 A. Okay.</p> <p>4 Q. Although it wasn't objected to. Let me ask you this: You say that you 6 were not even allowed to interview for those 7 positions?</p> <p>8 A. I wasn't given the opportunity.</p> <p>9 Q. Did you ask to?</p> <p>10 A. I didn't even know they were available.</p> <p>11 Q. You knew Marquez had quit, didn't you?</p> <p>12 A. Who?</p> <p>13 Q. You knew Marquez had quit.</p> <p>14 A. I don't think he had anything to do with these positions.</p> <p>16 Q. Lucia Alla took Marquez's position.</p> <p>17 A. No, Gabriele Mariotti.</p> <p>18 Q. I'm sorry. What did I say? Marquez? Oh, that's much later. Sorry, I had the names 20 confused.</p> <p>21 You knew that Mariotti had quit, didn't you?</p> <p>23 A. Yes, I did.</p> <p>24 Q. Did you ask about getting Mariotti's position?</p>	<p style="text-align: right;">Page 221</p> <p>1 LORUSSO</p> <p>2 Q. Okay. We will move on from the complaint. The next document that we will look at is 4 Defendant's Exhibit 4. It's your EEOC charge. (Defendant's Exhibit 4, EEOC charge, was 6 marked for identification as of this date.)</p> <p>7 Q. I'm going to ask you, first, Ms. Lorusso, 8 have you seen this document before?</p> <p>9 A. Yes.</p> <p>10 Q. Is that your signature on the page that's 11 stamped 0008?</p> <p>12 A. I'm sorry?</p> <p>13 Q. Is that your signature on page 8?</p> <p>14 A. Yes, it is.</p> <p>15 Q. Did you swear to the truth of this on the 16 24th of January 2007?</p> <p>17 A. Yes, I did.</p> <p>18 Q. Did you write this yourself?</p> <p>19 A. Yes, I did.</p> <p>20 Q. And you gave it to Mr. Behrins?</p> <p>21 A. Yes, I did.</p> <p>22 Q. And he notarized it for you?</p> <p>23 A. Yes, he did.</p> <p>24 Q. Did you understand that you were filling a 25 charge of discrimination with EEOC?</p>

56 (Pages 218 to 221)

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Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 234</p> <p>1 LORUSSO 2 work. I think you testified that was the 3 advertising. 4 A. Yes. 5 Q. Do you know if Francesca Forte ever ran an 6 advertising campaign? 7 MS. KURZON: Prior to being given -- 8 MR. KORAL: No. 9 Q. After being given these responsibilities, 10 did she ever run an advertising campaign? 11 A. I don't know. 12 Q. Wasn't all advertising at that point being 13 done in Rome? And by "done" I mean created and 14 handled by Rome. 15 A. I don't know. 16 Q. I think you already testified that she was 17 transferred to Rome eventually. 18 A. Yes. 19 Q. Sometime after the summer of 2005? 20 A. I don't recall. 21 Q. When Francesca Forte reported to you, what 22 did she do? What were her responsibilities? 23 I know you said you don't remember her 24 title. Do you remember what her responsibilities 25 were?</p>	<p style="text-align: right;">Page 235</p> <p>1 LORUSSO 2 medical benefits, but that you rejected the offer. 3 My first question is: Did he make this 4 offer in writing? 5 A. No. 6 Q. Were any of these negotiations I'll call 7 them about possible severance package done in 8 writing? 9 A. No. 10 Q. So these were all just conversations with 11 Libutti and Gallo? 12 A. Correct. 13 Q. But it was Libutti who offered the two 14 years? 15 A. Yes. 16 Q. Did he offer it to you as a solid offer or 17 did he say he would try to get it for you? 18 A. I don't recall. 19 Q. You say you rejected the offer because you 20 wanted to continue working; is that right? 21 A. Yes, sir. 22 Q. Now, you had already been looking for jobs 23 according to this. 24 A. Yes. 25 Q. And you had not been coming up with any?</p>
<p style="text-align: right;">Page 235</p> <p>1 LORUSSO 2 A. A lot of the work that Elizabeth and 3 Francesca did overlapped, so I don't remember 4 specifically what Francesca was doing. 5 Q. That's Elizabeth Santella? 6 A. Yes. 7 Q. Did it have something to do with 8 advertising? 9 A. Yes. 10 Q. To whom did Francesca report after you 11 went to GA2000? 12 A. To Giulio Libutti. 13 Q. She reported directly to Giulio? 14 A. I believe so. 15 Q. Who, if anybody, until the summer of 2005, 16 was handling advertising? Was Mr. Libutti doing 17 that himself? 18 A. I don't remember. 19 Q. Okay. You state at the top of page 5 that 20 you had several meetings with Gallo and Libutti 21 about a possible severance package. 22 Who initiated those conversations? 23 A. I don't recall. 24 Q. You state that Mr. Libutti offered you two 25 years' salary, lifetime airline ticket benefits and</p>	<p style="text-align: right;">Page 237</p> <p>1 LORUSSO 2 A. No. 3 Q. Because of your age and your level? 4 A. I believe so. 5 Q. Did the headhunters tell you that? 6 A. No. 7 Q. They did not say, Oh, you're too old to 8 get a job. You've got to stay where you are, alone 9 on the 36th floor. 10 They did not say something like that? 11 A. No. Not that I recall. 12 Q. Once you were in Cargo, what were your 13 activities? What jobs, tasks did you perform? 14 A. It wasn't clear. 15 Q. Okay. It states here, third paragraph 16 from the bottom on page 5 you began working on an 17 e-mail database. 18 Was that assigned to you? 19 A. No. It was not. 20 Q. It was something that you saw a need for 21 and decided to develop? 22 A. That is correct. 23 Q. In fact, it was to be a Cargo contacts 24 directory, wasn't it? Wasn't that what you 25 envisioned?</p>

60 (Pages 234 to 237)

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Ester Lorusso

12/19/2007

	Page 238	Page 240
1	LORUSSO	LORUSSO
2	A. Clients directory. Yes, a client	compensation with Mr. Gallo?
3	database.	3 A. No. I did not.
4	Q. And you distributed drafts of it at	4 Q. Let's take a look at page 6, the second
5	different time to various managers and directors in	5 full paragraph. This deals with Mr. Mariotti. Mr.
6	Cargo and asked them for input?	6 Mariotti had been pricing director, it says, and
7	A. Yes.	7 then in May he became director sales and marketing
8	Q. And you got that input from them?	8 coordination, Passenger Division, and he got the
9	A. Yes.	9 customer relations department.
10	Q. You also put together newsletters?	10 So at this point in time Mr. Mariotti had
11	A. Yes.	11 pricing, he had customer relations. He also had
12	Q. And also, didn't you develop fliers?	12 sales coordination and the alliance, didn't he?
13	A. Yes, I did.	13 A. I don't recall. I do remember him having
14	Q. Didn't you get a lot of very positive	14 pricing and customer relations.
15	feedback about the fliers you developed?	15 Q. How about sales coordination?
16	A. Yes, I did.	16 A. I don't recall.
17	Q. Certainly from Canada, in any event, and	17 Q. His title is director sales and marketing
18	Chicago?	18 coordination, Passenger Division?
19	A. I believe so.	19 A. Right.
20	Q. So you weren't without things to do,	20 Q. Did he ever tell you that he had – what
21	although some of these were things that you	21 his responsibilities were?
22	developed yourself such as the idea for the	22 A. I knew his responsibilities as pricing
23	database, correct?	23 director and marketing. I wasn't quite clear on the
24	A. That is correct.	24 sales coordination part.
25	Q. You state that Mr. DiFeo was given a	25 Q. Marketing coordination, correct?
1	LORUSSO	LORUSSO
2	yearly stipend of approximately \$60,000 for his	2 A. Right.
3	apartment. How did you know that?	3 Q. In Passenger?
4	A. I don't remember. I don't recall.	4 A. Right.
5	Q. Are you aware that Mr. DiFeo is an	5 Q. You weren't really interacting with him in
6	ex-patriot?	6 business because you were in Cargo and there was no
7	A. Yes.	7 real need to interact with Mr. Mariotti except on a
8	Q. And you know that ex-patriot compensation	8 friendly level; is that correct?
9	is very different from a local national	9 A. That's correct.
10	compensation?	10 Q. Are you aware that Lucia Alla now is
11	A. Yes.	11 responsible for pricing?
12	Q. Ex-patriots often get living allowance and	12 A. Yes.
13	schooling allowances and taxes grossed up and all	13 Q. And that she is responsible for sales
14	that stuff. Are you aware of that?	14 coordination?
15	A. Yes, I am.	15 A. If that's her title, then yes.
16	Q. How do you know that Mr. DiFeo's salary	16 Q. I'm not representing what her title is.
17	was \$95,000?	17 A. Okay.
18	A. I don't recall.	18 Q. Also, she is responsible for customer
19	Q. Do you know for a fact that it is or	19 relations, correct?
20	you're not really sure?	20 A. I am aware that she took Gabriele
21	MS. KURZON: Objection.	21 Mariotti's position.
22	Q. Do you know for a fact that his salary was	22 Q. Okay. And you didn't hear anything to
23	\$95,000?	23 suggest that she didn't get all of it. She is doing
24	A. No. I don't know for a fact.	24 basically what Mariotti was doing?
25	Q. Did you ever discuss Mr. DiFeo's	25 A. Correct.

61 (Pages 238 to 241)

Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 242</p> <p>1 LORUSSO</p> <p>2 Q. Do you know that she is doing alliance as 3 well?</p> <p>4 A. No.</p> <p>5 Q. Okay. In the next paragraph, just so we 6 clarify this, the third one down, the last sentence. 7 "I was the only employee in an office on the 36th 8 floor."</p> <p>9 Do you mean you were the only employee 10 left in the GA2000 office? Is that what you mean?</p> <p>11 A. That's correct.</p> <p>12 Q. Because there certainly were other 13 employees on the 36th floor in offices?</p> <p>14 A. Very few.</p> <p>15 Q. Well, there was IT?</p> <p>16 A. There were about three people in IT. And 17 as I said, I don't remember when the ticket office 18 closed.</p> <p>19 Q. How many were there before it closed, do 20 you know?</p> <p>21 A. In the ticket office?</p> <p>22 Q. Yes. Was it a half dozen people?</p> <p>23 A. It would be eight, maybe.</p> <p>24 Q. The ticket people had like cubicles in 25 their office?</p>	<p style="text-align: right;">Page 244</p> <p>1 LORUSSO</p> <p>2 departure.</p> <p>3 Q. But you know that he left?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know whether it was voluntary or 6 involuntary?</p> <p>7 A. I don't know.</p> <p>8 Q. How did you hear that he'd left at all?</p> <p>9 A. In the conversation, probably, with 10 Gabriele Mariotti.</p> <p>11 Q. Of course Mr. Mariotti had left before you 12 left?</p> <p>13 A. Right.</p> <p>14 Q. But he hears things?</p> <p>15 A. I think that he probably is more in 16 contact with some folks from the company. I 17 certainly am not -- you know whom I am in contact 18 with. I've already told you.</p> <p>19 Q. We've been through it.</p> <p>20 A. Yes.</p> <p>21 Q. The July 2006 worldwide Cargo meeting that 22 you weren't invited to, did you ever discuss with 23 Mr. Longo, Walter Longo why you weren't invited?</p> <p>24 A. Yes. I had a conversation with him after 25 they came back.</p>
<p style="text-align: right;">Page 243</p> <p>1 LORUSSO</p> <p>2 A. It was a ticket office that was open to 3 the public so it was -- imagine a ticket office, not 4 really cubicled.</p> <p>5 Q. Desks, sort of an open desk kind of area?</p> <p>6 A. That's correct.</p> <p>7 Q. The next paragraph says that Paul Baxtrum 8 sent you an e-mail asking you to update the Cargo 9 phone directory.</p> <p>10 Do you still have that e-mail? Is that 11 one of the documents you believe you produced, 12 because I don't believe I've seen it although I 13 won't swear I haven't seen it.</p> <p>14 A. No, I don't.</p> <p>15 Q. You don't recall whether you've seen it 16 recently in preparation, say, for today's 17 deposition?</p> <p>18 A. I don't recall if it was in the batch of 19 papers that I handed over last week.</p> <p>20 Q. Do you know, by the way, whether Paul 21 Baxtrum is still working for Alitalia?</p> <p>22 A. I heard that he had left.</p> <p>23 Q. Did you hear that he was riffed? That his 24 job position was terminated around March of 2007?</p> <p>25 A. I don't know the particulars of his</p>	<p style="text-align: right;">Page 245</p> <p>1 LORUSSO</p> <p>2 Q. And what did Mr. Longo say?</p> <p>3 A. I think he told me that it was Rome's 4 decision.</p> <p>5 Q. Did he explain who in Rome had made that 6 decision?</p> <p>7 A. I don't recall.</p> <p>8 Q. Did he give you any other rationale such 9 as well you were marketing coordination. This had 10 nothing to do with marketing coordination.</p> <p>11 A. I don't recall. Paul Baxtrum was customer 12 relations.</p> <p>13 Q. This states -- okay. Do you know who has 14 that responsibility now?</p> <p>15 A. No. The reason why I'm saying it was 16 because he was included in that meeting.</p> <p>17 Q. I got you. And customer relations, as you 18 see it, is really part of the marketing function or 19 associated with the marketing --</p> <p>20 A. It was on the Passenger side.</p> <p>21 Q. Well, when you were in charge of it. 22 Now customer relations is associated with 23 pricing. And, if you can believe me, also with 24 alliance and a few other things.</p> <p>25 You mentioned that Tim O'Neill had a</p>

62 (Pages 242 to 245)

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Ester Lorusso

12/19/2007

	Page 246	Page 248
1 LORUSSO		1 LORUSSO
2 generous early retirement package. That was the		2 Q. Did you tell anybody that you made copies
3 regular ERP, right?		3 of them at that time?
4 A. I believe so.		4 A. No.
5 Q. Tim didn't get anything more than the ERP		5 Q. Did you question Mr. Longo about that
6 people did, as far as you know?		6 incentive program?
7 A. No. But since Tim had been there a long		7 A. I don't believe I did.
8 time, it was a generous package.		8 Q. Did you ask Mr. Porru about it?
9 Q. I just want to get at this was not a		9 A. I don't believe I did.
10 special deal for Tim. Tim took the same deal that a		10 Q. Did you ask anybody in HR about it?
11 lot of other people took.		11 A. I don't believe I did.
12 A. I understand.		12 Q. Did you discuss it with Mr. Baxtrum --
13 Q. That's correct?		13 A. No.
14 A. That's correct.		14 Q. -- the incentive scheme?
15 Q. Do you know who is vice president of Cargo		15 A. No.
16 now of North America in New York?		16 Q. Mr. Baxtrum doesn't know that you have a
17 A. No, I don't.		17 copy of this letter, as far as you know?
18 Q. Do you know where Mr. Longo is now?		18 A. As far as I know.
19 A. I believe he retired.		19 Q. How about Mr. DiFeo? Did you discuss it
20 Q. Do you know when he retired?		20 with him?
21 A. It was at the end of December in 2006.		21 A. No, I did not.
22 Q. Okay, 2006. So he retired before your job		22 Q. As far as you know he doesn't know that
23 was terminated?		23 you have a copy of this letter?
24 A. Yes.		24 A. As far as I know.
25 Q. Have you had any communication with him		25 Q. So you're not aware of what explanation,
1 LORUSSO	Page 247	
2 since he retired?		1 LORUSSO
3 A. No.		2 if any, there is for your not being part of the
4 Q. Have you had any communication with Mr.		3 incentive program? Correction. Nobody at Alitalia
5 Baxtrum since he left?		4 has ever given you an explanation for why --
6 A. No.		5 A. I don't recall.
7 Q. Have you had any communication with		6 Q. Sorry?
8 anybody from Cargo since you left?		7 A. I don't recall.
9 A. No.		8 Q. Well, you haven't asked anybody about it.
10 Q. I'm going to ask you some questions about		9 Do you think somebody volunteered that information?
11 the incentive scheme in Cargo.		10 A. No.
12 How did you learn about it?		11 Q. Is that right?
13 A. I saw it.		12 A. Yes.
14 Q. You saw the incentive scheme?		13 Q. Am I correct nobody at Alitalia has ever
15 A. I saw the letters addressed to Paul		14 said, well, of course you are not in this program,
16 Baxtrum and Micheala DiFeo.		15 Ms. Lorusso, because whatever?
17 Q. How did you come to see those letters?		16 MS. KURZON: Objection.
18 A. They were on the copy machine in the		17 Q. It's okay. You can answer.
19 office.		18 A. I honestly don't remember.
20 Q. They were on the office copy machine?		19 Q. Okay.
21 A. Yes, they were.		20 MR. KORAL: Could we go off the record for
22 Q. And you read them?		21 a moment.
23 A. Yes, I did.		22 MS. KURZON: Sure.
24 Q. And you made copies of them?		23 VIDEOGRAPHER: The time is 3:19 p.m. We
25 A. Yes.		24 are going off the record. (A break was taken.)

63 (Pages 246 to 249)

Ester Lorusso

12/19/2007

		Page 250	Page 252
1	LORUSSO		LORUSSO
2	VIDEOGRAPHER: The time is 3:22 p.m. We're	2 no reason not to believe that.	3 Q. When you say the compensation you are
3	back on the record.	4 talking about the ex-patriot benefits?	5 A. Correct, meaning the total compensation.
4	MR. KORAL: Let us mark as Defendant's	6 Q. Was your salary lower than that of the	7 director of public relations?
5	Exhibit 5 a document from Ester Lorusso to	8 A. Again, I considered her not part of our	9 entity because she reported to Rome and at a certain
6	Andrea Sciarresi dated August 24, 2004.	10 point it was switched. I don't remember exactly	11 when it was switched but she was -- she was in a
7	(Defendant's Exhibit 5, document, was	12 separate division, let's say.	13 MS. KURZON: Can we identify "she" for the
8	marked for identification as of this date.)	14 record?	15 THE WITNESS: Martha Lotti.
9	Q. Ms. Lorusso, did you send this document to	16 Q. Do you know how her compensation was	17 determined?
10	Mr. Sciarresi?	18 A. No, I don't.	19 Q. Do you know who determined it?
11	A. Yes, I did.	20 A. No, I don't.	21 Q. So it could be that New York determined
12	Q. What was your reason for sending it?	22 the compensation of the director of public	23 relations?
13	A. This seems weird.	24 A. Pardon me?	25 Q. So it could be that New York determined
14	Q. This is a document that we produced to		
15	your attorneys?		
16	A. Yes. I'm sorry.		
17	Q. Do you remember the question? What was		
18	your reason for sending it to Mr. Sciarresi?		
19	A. The reason for sending it to Mr. Sciarresi		
20	is because I felt that I was being sexually		
21	discriminated against.		
22	Q. The first statement you make, in the		
23	second paragraph, is that you're the lowest paid		
24	person at your level.		
25	You mean that you were the lowest paid		
		Page 251	Page 253
1	LORUSSO	1 LORUSSO	
2	director?	2 her compensation, correct?	3 A. It could be, but I'm not sure.
3	A. Yes.	4 Q. All right. And she was a director?	5 A. Yes.
4	Q. How did you know that?	6 Q. Do you know whether her compensation was	7 higher or lower than Mr. Mariotti's?
5	A. The three directors were -- I think	8 A. I don't know.	9 Q. Do you know if Mr. Mariotti knew what her
6	Gabriele and I discussed it and he told me the other	10 compensation was?	11 A. No. I don't know.
7	salaries, his own salary and --	12 Q. Just to clarify, we are talking about	13 Martha Lotti, correct?
8	Q. Mr. Mariotti told you his own salary and	14 A. That's correct.	15 Q. These directors that you're talking about,
9	other people's salaries?	16 "lowest paid person at my level," about whom are you	17 speaking? You weren't talking about Lotti, you
10	A. I believe so.	17 A. Correct.	18 don't know what her comp was.
11	Q. And he found those salaries in a photocopy	19 A. Correct.	20 Q. You weren't talking about Mr. D'Ilario
12	machine?	21 because he was an ex-pat and he had a compensation	22 package.
13	A. No. I don't know.	23 A. No. I was talking about Mr. D'Ilario, Mr.	24 Mariotti and Mr. O'Neill.
14	MS. KURZON: Objection.	25 Q. You were talking about those three?	
15	Q. Did he tell you how he found them?		
16	A. No.		
17	Q. If I told you that Mr. D'Ilario's salary		
18	was lower than yours, do you have any reason not to		
19	believe that?		
20	A. Total compensation. We are talking about		
21	housing costs paid for as well.		
22	Q. In terms of salary, if I told you that Mr.		
23	D'Ilario's salary was lower than yours, would you		
24	have any reason not to believe that?		
25	A. Taking away the compensation, no, I have		

64 (Pages 250 to 253)

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Ester Lorusso

12/19/2007

	Page 254	Page 256
1 LORUSSO		1 LORUSSO
2 A. Yes.		2 Q. Did you discuss this letter with Mr.
3 Q. D'Ilario, you are talking about really his		3 Libutti and Mr. Sciarresi at any time?
4 whole package including his ex-pat –		4 A. I don't recall.
5 A. His compensation.		5 Q. There are two CC's on this letter. One is
6 Q. -- his ex-pat benefits plus his salary?		6 to TYNYC and one is to UGNYC.
7 A. His compensation, his total compensation.		7 Do you know what those stand for?
8 Q. Which consists of ex-pat benefits plus		8 A. I don't recall.
9 salary.		9 Q. Do you recall receiving this letter?
10 A. Call it what you will.		10 A. Yes, I do.
11 Q. Well, do you disagree with that?		11 Q. You did not regard this as a promotion, as
12 A. No.		12 you've testified earlier.
13 Q. Do you know what Mr. O'Neill's salary was?		13 A. No. It was a transfer.
14 A. Exactly? No, but I'm sure it was higher		14 Q. But you don't dispute that you were called
15 than mine.		15 managing director, do you?
16 Q. Do you know what Mr. Mariotti's was?		16 A. No, I don't.
17 A. I don't remember.		17 Q. And you don't dispute that your salary was
18 Q. Do you remember what yours was in August		18 increased from \$78,520.80 to \$105,000 per annum?
19 of 2004?		19 A. That's correct.
20 A. I believe it was \$80,000.		20 Q. Correct?
21 Q. You believe that O'Neill's was higher and		21 A. Yes.
22 you believe that Mariotti's was higher?		22 Q. And you continued on all the Alitalia
23 A. Correct.		23 benefits, correct?
24 Q. And you believe that the whole value of		24 A. Correct.
25 Mr. D'Ilario's compensation package was higher?		25 Q. Did the GA2000 other employees besides you
1 LORUSSO	Page 255	
2 A. That's correct.		1 LORUSSO
3 Q. Did you hear back from Mr. Sciarresi		2 and Mr. Farrow continue on Alitalia benefits?
4 regarding this e-mail?		3 A. No. Nor did they start on Alitalia
5 A. I don't recall.		4 benefits.
6 Q. You did eventually have a conversation		5 Q. "Continue" was the wrong word.
7 with Franco Gallo and Stephanie Di Clemente about		6 Did they ever get Alitalia benefits?
8 it?		7 A. No.
9 A. Yes, I did.		8 MR. KORAL: Let's look at a document we'll
10 Q. When you were in the Cargo Division, do		9 mark Defendant's Exhibit 7 from you to Andrea
11 you know what your salary was relative to that of		10 Sciarresi dated September 1.
12 Mr. Baxtrum and Mr. Guidotti?		11 MS. KURZON: September 1, 2004.
13 A. No, I don't.		12 MR. KORAL: 2004.
14 Q. So you don't know whether yours was higher		13 (Defendant's Exhibit 7, document, was
15 or lower than theirs?		14 marked for identification as of this date.)
16 A. No, I don't.		15 Q. Do you recall sending this to Mr.
17 MR. KORAL: Let's move on. We'll mark as		16 Sciarresi?
18 Defendant's Exhibit 6 a letter signed by Mr.		17 A. Yes, I do.
19 Scerasi and Mr. Libutti dated September 1, 2004		18 Q. And you copied Mr. Libutti?
20 and stamped September, I believe it's 22, 2004.		19 A. Yes, I did.
21 MS. KURZON: May I have a copy, please?		20 Q. You hadn't copied him on the letter we
22 MR. KORAL: I'm sorry.		21 just looked at, which was Exhibit 6, I believe.
23 It's stamped September 2, 2004. To you.		22 Is there a reason why you didn't?
24 (Defendant's Exhibit 6, letter, was marked		23 MS. KURZON: He signed it.
25 for identification as of this date.)		24 MR. KORAL: Not 6, 5. The other e-mail to
		25 Sciarresi.

65 (Pages 254 to 257)

Ester Lorusso

12/19/2007

	Page 258	Page 260
1 LORUSSO		1 LORUSSO
2 A. I don't recall.		2 A. I believe so.
3 Q. Now, in fact, you hadn't, at this point,		3 Q. So obviously you made no attempt to
4 accepted the position, correct?		4 contact her at the time you later contacted Mr.
5 A. That's correct.		5 Behrins?
6 Q. When is the last time you spoke with		6 A. That's correct.
7 Cynthia Gill?		7 Q. Do you know what state she moved to?
8 A. It must have been in 2004, the end of		8 A. I remember her mentioning Florida.
9 2004.		9 Q. Sounds good to me.
10 Q. Do you know whether she is an employment		10 MR. KORAL: We'll mark as Defendant's 8 a
11 lawyer, a lawyer with expertise in employment law		11 document to file from Stephanie Di Clemente
12 the way your current attorneys are?		12 dated Wednesday, September 22, 2004.
13 A. Yes.		13 MS. KURZON: September 2?
14 Q. She is?		14 MR. KORAL: That's a strange thing.
15 A. She is.		15 Let's go off the record while I figure
16 Q. How did you find her?		16 this out.
17 A. She was Kursheed Pakhiwala's attorney.		17 VIDEOGRAPHER: The time is 3:37 p.m. We
18 Q. I'm sorry?		18 are going off the record.
19 A. She was Kursheed Pakhiwala's attorney?		19 (A break was taken.)
20 Q. She was Ms. Pakhiwala's attorney, okay.		20 VIDEOGRAPHER: The time is 3:38 p.m. We
21 For how long did you remain her client?		21 are back on the record.
22 A. A few months.		22 Q. Let me just ask you a couple of questions
23 Q. A few months?		23 about a meeting that you've already testified you
24 A. Yes.		24 recall having with Mr. Gallo and Stephanie Di
25 Q. So she continued to give you legal advice		25 Clemente.
	Page 259	Page 261
1 LORUSSO		1 LORUSSO
2 over the next several months?		2 The first question is: Who called the
3 MS. KURZON: Objection.		3 meeting?
4 A. I don't recall, to be honest.		4 A. It was Mr. Gallo, I believe.
5 Q. Do you recall when you engaged her?		5 Q. Did it take place in his office?
6 A. When Libutti asked for me to be		6 A. Yes, it did.
7 transferred to GA2000, around that time.		7 Q. Did Mr. Gallo explain what the meeting was
8 Q. Around that time, that's sometime in		8 about?
9 August 2004?		9 A. Yes.
10 A. July or August 2004.		10 Q. Did he tell you he was investigating your
11 Q. And she continued as your attorney for		11 discrimination complaint?
12 several months?		12 A. Yes.
13 A. I don't recall.		13 Q. And he asked you a series of questions?
14 Q. I'm sorry. You just said that so I just		14 A. Yes.
15 wanted to clarify that.		15 Q. You got an opportunity to speak, correct?
16 A. I know. It was a few months.		16 A. Yes.
17 Q. Do you recall at some point discharging		17 Q. Did Ms. Di Clemente say anything?
18 her as your attorney?		18 A. I don't recall.
19 A. No.		19 Q. Do you recall that she was taking notes?
20 Q. How did the relationship come to an end		20 A. Yes.
21 then?		21 Q. Prior to this litigation, had you ever
22 A. I think Ms. Gill was about to move to		22 seen any copies of those notes?
23 another state.		23 A. No.
24 Q. So you think she actually moved and that		24 Q. Were you satisfied with the meeting you
25 was the end of that relationship?		25 had with Mr. Gallo and Ms. Di Clemente?

66 (Pages 258 to 261)

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Ester Lorusso

12/19/2007

	Page 262	Page 264
1	LORUSSO	LORUSSO
2	MS. KURZON: Objection.	A. No. I did not.
3	Q. You can answer, if you can.	Q. The meeting at headquarters was a sales
4	A. The meeting was just to ask me some	meeting, correct? That's what this memo says.
5	questions so that they would get back to me. In	A. Yes.
6	other words, the investigation was supposed to be	Q. Had you ever been invited to sales
7	done after this meeting.	meetings at headquarters prior to September of 2004?
8	Q. That was your understanding, that Mr.	A. I don't recall.
9	Gallo was going to go out and investigate now?	Q. Okay.
10	A. That's correct.	MR. KORAL: Let's move on. We'll mark as
11	Q. And your belief is that he never did?	Defendant's Exhibit 9 a letter from Alitalia
12	A. That's correct.	signed by Mr. Libutti and Mr. Gallo to Ms.
13	Q. Did he ever communicate anything about his	Lorusso, dated September 17, 2004.
14	investigation to you?	(Defendant's Exhibit 9, letter, was marked
15	A. I don't believe so.	for identification as of this date.)
16	Q. Did you ever ask him about it?	Q. Do you recall seeing this before, Ms.
17	A. I don't recall.	Lorusso?
18	MR. KORAL: Let's take a look at a	A. Yes, I do.
19	document that we can mark as Defendant's	Q. Do you recall seeing it at the time that
20	Exhibit 8.	it was apparently sent, around September 17, 2004?
21	(Defendant's Exhibit 8, document, was	A. Yes, I do.
22	marked for identification as of this date.)	Q. Let me ask you, first, what is ZZ-NYC
23	Q. Let me ask, do you recall sending this to	mean?
24	Mr. Libutti?	A. That was a code for my department.
25	A. Yes, I do.	Q. And "the department" being marketing
1	LORUSSO	LORUSSO
2	MR. KORAL: This is an e-mail from Ester	communications?
3	Lorusso to Giulio Libutti dated September 16,	A. That's correct.
4	2004, and the subject is 9/16/2004.	Q. Does this refresh your recollection as to
5	MS. KURZON: It's to Libutti and Gallo?	whether you were given an explanation -- whether you
6	MR. KORAL: I'm sorry?	liked it or not -- about the meeting on September
7	MS. KURZON: To Libutti and Gallo?	13, 14 at headquarters?
8	MR. KORAL: Yes. It goes to Libutti and	A. Yes, it does.
9	to Gallo.	Q. Did you have any discussion about this
10	Q. First, let me ask -- you've already	letter with Mr. Gallo after you received it?
11	testified you remember sending it. Did you ever get	A. I don't recall.
12	an explanation as to why you did not get to go to	Q. Did you have any discussion with Mr.
13	this meeting at headquarters on September 13 and 14?	Libutti about this letter after you received it?
14	A. I don't recall.	A. I don't recall.
15	Q. You state that at present Alitalia lacks a	Q. Do you recall discussing this letter with
16	human resources director. What happened to Mr.	anybody?
17	Sciarresi, if you recall?	A. I don't recall.
18	A. I believe he was in the hospital.	Q. Did you understand from this letter that
19	Q. Do you have any idea why?	you had to make up your mind about the GA2000
20	A. He had mental issues.	position sometime between September 17 and September
21	Q. Did he have something that people were	20, that they were giving you an ultimatum, in
22	calling a nervous breakdown?	effect?
23	A. That was the rumor at the time.	A. Yes.
24	Q. Did you ever see Mr. Sciarresi again after	Q. Did you discuss with Mr. Gallo the fact
25	he was hospitalized around September of 2004?	that you were being given an ultimatum about that

67 (Pages 262 to 265)

Ester Lorusso

12/19/2007

	Page 266	Page 268
1 LORUSSO		1 LORUSSO
2 position?		2 Q. Do you know if she met with Mr. Galli?
3 A. I don't recall.		3 A. I don't know.
4 Q. Did you discuss that with Mr. Libutti?		4 Q. Do you know if she traveled to Rome?
5 A. I don't recall.		5 A. I believe she did.
6 Q. Did you discuss it with anybody else?		6 Q. For meetings?
7 A. I don't recall.		7 A. I don't know.
8 Q. Was Ms. Gill still your attorney at this		8 Q. As opposed to pleasure, I mean.
9 point, September 17?		9 A. I don't know.
10 A. I am trying to remember. I believe she		10 Q. Was Ms. Lotti a U.S. national or was she
11 was.		11 an ex-pat?
12 Q. I don't want to know the contents of		12 A. She was a U.S. national.
13 anything that she said, but you don't recall		13 Q. Did you ever discuss this memo with Mr.
14 actually whether she was your attorney?		14 Gallo?
15 A. I believe she was.		15 A. I don't recall.
16 Q. Again, without discussing the contents of		16 Q. Did you ever discuss this memo with Mr.
17 anything you or she said, did you discuss this memo		17 Libutti?
18 with Ms. Gill or -- no, let me ask that first, if		18 A. I don't recall.
19 you recall?		19 Q. Do you know whether Mr. D'Oro was at that
20 A. I don't recall.		20 meeting on September 13, 14 in Rome?
21 Q. Did you discuss the ultimatum aspect of it		21 A. I don't know.
22 with Ms. Gill, if you recall? Don't tell me what		22 Q. Mr. D'Oro was vice president, was he not?
23 she said or what you said.		23 A. I don't know.
24 A. I may have.		24 Q. He was either a vice president or director
25 MR. KORAL: Here we have Defendant's		25 in 2004?
	Page 267	Page 269
1 LORUSSO		1 LORUSSO
2 Exhibit 10, an e-mail from Ester Lorusso to		2 A. Correct.
3 Libutti and Gallo, dated September 20, 2004,		3 MR. KORAL: We'll move on to Defendant's
4 subject your letter dated 9/17.		4 Exhibit 11 which is a confidential memo to Ms.
5 (Defendant's Exhibit 10, e-mail, was		5 Ester Lorusso signed by it looks like Stephanie
6 marked for identification as of this date.)		6 Di Clemente for Andrea Sciarresi and by Giulio
7 Q. Looking at this memo, do you recall		7 Libutti, dated October 13, 2004.
8 sending it?		8 (Defendant's Exhibit 11, memo, was marked
9 A. Yes, I do.		9 for identification as of this date.)
10 Q. You state that you were the only director		10 Q. Do you recall receiving this?
11 who was not invited to the meeting?		11 A. Yes, I do.
12 A. That is correct.		12 Q. Does this refresh your recollection as to
13 Q. Do you know whether Ms. Lotti was invited?		13 the effective date of the promotion?
14 A. Again, Ms. Lotti was not part of our		14 A. Yes, it does.
15 division so I don't consider her --		15 Q. That was November 1?
16 Q. Explain what you mean by "division." She		16 A. That's correct.
17 was not part of Passenger?		17 Q. Starting at that time you began collecting
18 A. She was part of Passenger, but she did not		18 the \$105,000 salary?
19 meet with us. We had no --		19 A. That is correct.
20 Q. Ms. Lotti was in charge of public		20 MR. KORAL: Defendant's 12 will be a memo
21 relations and she did not meet with people in the		21 to file from Stephanie Di Clemente, dated
22 rest of the Passenger Division?		22 October 25, 2004, subject Libutti's rebuttal
23 A. No. She did not.		23 reference, Lorusso's claim.
24 Q. Do you know if she met with Mr. Libutti?		24 (Defendant's Exhibit 12, memo, was marked
25 A. I don't know.		25 for identification as of this date.)

68 (Pages 266 to 269)

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Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 270</p> <p>1 LORUSSO</p> <p>2 Q. The first question is, have you seen this 3 before. You haven't seen it yet, have you?</p> <p>4 A. Have I seen this before? Yes, I have.</p> <p>5 Q. When did you first see it?</p> <p>6 A. From my attorney, recently.</p> <p>7 Q. In preparation for this deposition?</p> <p>8 A. Yes.</p> <p>9 Q. Mr. Libutti says that after Paolo Rubino 10 left his position in home office marketing — in 11 home office, sorry, that marketing initiatives from 12 the U.S. would carry less weight and importance in 13 the office. He denies that he was making a threat 14 to your position, that that was just in effect.</p> <p>15 Do you accept that? Do you recollect now 16 that Mr. Libutti said to you, Well, with Rubino gone 17 from marketing they're not going to pay as much 18 attention to the U.S. on marketing issues?</p> <p>19 A. I don't recall that it was stated that 20 way. I recall him mentioning Rubino, but not that 21 sentence that way.</p> <p>22 Q. Mr. Libutti states that he never wrote 23 nasty e-mails to you, but only working e-mails 24 reminding you to pay more attention to his work. 25 You disagree with that?</p>	<p style="text-align: right;">Page 272</p> <p>1 LORUSSO</p> <p>2 A. The entire statement. Alitalia was the 3 originator of the yearly symposium.</p> <p>4 Q. So Alitalia's involvement was not only in 5 choosing a trade segment and making the 6 reservations?</p> <p>7 A. That's correct.</p> <p>8 Q. Is it true that you were one of the key 9 speakers at the symposium?</p> <p>10 A. Yes, I was.</p> <p>11 Q. What does OM stand for in paragraph 4, if 12 you know?</p> <p>13 A. That was Tim O'Neill's department.</p> <p>14 Q. And Mr. Libutti says that it's not true 15 that Grace DeFranco got the planning, I guess, of 16 the symposium.</p> <p>17 Do you know now whether it's true or not 18 that Grace got the planning of the symposium?</p> <p>19 A. She got the planning of the symposium.</p> <p>20 Q. You say she did?</p> <p>21 A. Yes, she did.</p> <p>22 Q. Do you have any documentation for that 23 that you looked at, say, recently?</p> <p>24 A. The planner up until that point was 25 Elizabeth Santella.</p>
<p style="text-align: right;">Page 271</p> <p>1 LORUSSO</p> <p>2 A. Yes. His tone was always nasty when he 3 wrote to me.</p> <p>4 Q. Do you have any samples of that? I 5 understand that you don't have them with you but can 6 you recall anything specific that you thought was 7 nasty -- that you felt was nasty? I understand that 8 these were written long ago on the one hand, but on 9 the other hand you have been going over a lot of 10 stuff in preparation for deposition so perhaps 11 something stands up in your mind?</p> <p>12 A. I don't recall at this moment.</p> <p>13 Q. What is ENIT in paragraph 3?</p> <p>14 A. The Italian government tourist office.</p> <p>15 Q. The Italian government tourist office?</p> <p>16 A. Yes.</p> <p>17 Q. And AZ is the code for Alitalia, correct?</p> <p>18 A. That is correct.</p> <p>19 Q. Libutti is stating that the symposium was 20 organized by the Italian government tourist office 21 and that Alitalia's involvement was only in choosing 22 the trade segment and making reservations.</p> <p>23 Is that true?</p> <p>24 A. That's not true.</p> <p>25 Q. What's false about it?</p>	<p style="text-align: right;">Page 273</p> <p>1 LORUSSO</p> <p>2 Q. In your department?</p> <p>3 A. Yes.</p> <p>4 Q. How do you know that it went over to 5 Grace?</p> <p>6 A. She was doing the work.</p> <p>7 Q. She was doing the work?</p> <p>8 A. Yes.</p> <p>9 Q. How much work was involved? A day? A 10 week? A month? A year?</p> <p>11 A. A few weeks.</p> <p>12 Q. Sorry?</p> <p>13 A. A few weeks.</p> <p>14 Q. Full time?</p> <p>15 A. No.</p> <p>16 Q. You mean the planning took a few weeks to 17 do but it was just part of somebody's job. It 18 wasn't a full time kind of thing?</p> <p>19 A. Correct.</p> <p>20 Q. Did you recall telling Mr. Gallo that Mr. 21 O'Neill's staff was inexperienced?</p> <p>22 A. Repeat the question, please. (Testimony was read back.)</p> <p>23 Q. I'm sorry. Let me correct that. It 24 wasn't Mr. Gallo. It was Mr. Libutti?</p>

69 (Pages 270 to 273).

Ester Lorusso

12/19/2007

<p style="text-align: right;">Page 282</p> <p>1 LORUSSO</p> <p>2 Q. I will ask, did you look at this document 3 in connection with your preparation for today's 4 deposition?</p> <p>5 A. Yes.</p> <p>6 Q. And you saw Libutti's comments?</p> <p>7 MS. KURZON: Objection. Again, these are 8 not handwritten comments from Libutti, are 9 they? Didn't we just discuss that those would 10 have been in Italian?</p> <p>11 MR. KORAL: Well, she said that, but these 12 are Libutti's handwritten comments. I'm 13 representing that they are.</p> <p>14 MS. KURZON: I trust your representation.</p> <p>15 MR. KORAL: When you finally take Mr. 16 Libutti's deposition you can ask him about it, 17 but I believe he wrote these comments and then 18 had a meeting with Gallo and Stephanie and 19 explained himself.</p> <p>20 Q. The first question, Ms. Lorusso, did 21 Stephanie Di Clemente speak Italian?</p> <p>22 A. I don't know. I don't think so.</p> <p>23 Q. She is American?</p> <p>24 A. Yes, she is.</p> <p>25 Q. And she speaks English without a</p>	<p style="text-align: right;">Page 284</p> <p>1 LORUSSO</p> <p>2 Wednesday, 11 October, from Mr. Porru.</p> <p>3 Q. Did you review this e-mail chain or these 4 two e-mails, Ms. Lorusso, prior to today?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Do you recall receiving Mr. Porru's e-mail 7 at the time it was sent?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Did you discuss this communication with 10 Mr. Porru?</p> <p>11 A. I don't believe so.</p> <p>12 Q. Did you discuss it with Mr. Longo? And by 13 "it" I mean Mr. Porru's e-mail to you.</p> <p>14 A. I don't recall.</p> <p>15 Q. What about the e-mail addressed originally 16 to Walter Longo with a copy to Mr. Porru that you 17 sent.</p> <p>18 Did you discuss that with Mr. Longo?</p> <p>19 A. I don't recall.</p> <p>20 Q. Do you recall discussing it with anybody, 21 apart from your lawyers in connection with your 22 lawsuit?</p> <p>23 A. I don't recall.</p> <p>24 Q. Did you have conversations with Mr. Porru 25 about your discrimination complaint at any time</p>
<p style="text-align: right;">Page 283</p> <p>1 LORUSSO</p> <p>2 noticeable foreign accent?</p> <p>3 A. Yes.</p> <p>4 Q. You just don't know whether she speaks 5 Italian, say, as you do, because you speak English 6 without an accent at all?</p> <p>7 A. I've never heard her. I have never heard 8 her speak Italian.</p> <p>9 Q. Did you ever send her anything in writing 10 in Italian?</p> <p>11 A. No.</p> <p>12 MR. KORAL: Really all I wanted to do was 13 to get this on the record because this is, I 14 believe, the attachment to the prior exhibit.</p> <p>15 This is Defendant's 14. It is an e-mail 16 from Andrea Porru to Ester Lorusso with a copy 17 to Walter Longo. The subject is Cargo 18 position.</p> <p>19 (Defendant's Exhibit 14, e-mail, was 20 marked for identification as of this date.)</p> <p>21 MR. KORAL: Let me represent that this is 22 actually a three-page document consisting of an 23 original e-mail from Ester Lorusso to Walter 24 Longo with a copy to Mr. Porru, dated 25 Wednesday, 27 December 2006, and a response on</p>	<p style="text-align: right;">Page 285</p> <p>1 LORUSSO</p> <p>2 following September 17?</p> <p>3 A. I don't believe so.</p> <p>4 Q. No?</p> <p>5 A. I don't recall.</p> <p>6 Q. Okay. You don't recall?</p> <p>7 A. I don't recall.</p> <p>8 Q. Do you know whether Mr. Porru made any 9 investigation of your complaint?</p> <p>10 A. I believe that the day that I was 11 terminated I was given a response.</p> <p>12 Q. All right. Did Mr. Porru attempt to talk 13 to you about these claims, about your discrimination 14 claim while you were still employed?</p> <p>15 A. I believe so.</p> <p>16 Q. Did you refuse to speak with him?</p> <p>17 A. I think it was after I was terminated.</p> <p>18 Q. Did you refuse to speak with him?</p> <p>19 A. Yes.</p> <p>20 Q. Yes?</p> <p>21 A. Yes.</p> <p>22 Q. Do not tell me anything that you were 23 advised by your attorneys. Other than that, can you 24 describe your reason for not doing it, if it was 25 your own.</p>

72 (Pages 282 to 285)

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Ester Lorusso

12/19/2007

	Page 286	Page 288
1	LORUSSO A. No. No, I cannot. Q. I got you. MR. KORAL: I could actually use a five-minute break. VIDEOGRAPHER: The time is 4:15 p.m. We are going off the record. (A break was taken.) VIDEOGRAPHER: This is tape number 5 of the videotape deposition of Ms. Ester Lorusso. The time is now 4:25 p.m. We are back on the record. MR. KORAL: We will mark as Defendant's 15 an e-mail from Andrea Porru to Ester Lorusso, dated Tuesday, November 7, 2006, subject Wednesday's meeting. Copied are Walter Longo and Thierry Aucoc. (Defendant's Exhibit 15, e-mail, was marked for identification as of this date.) Q. Ms. Lorusso, have you seen this before? A. Yes. Q. Did you receive it at that time it's dated? A. Yes, I did. Q. This is a response from Mr. Porru to you?	1 LORUSSO A. I don't recall. MR. KORAL: Let's move on. Defendant's 16. I'm sorry. This document was inadvertently produced and I would like all the copies, please, including the one we produced to you. I think these are privileged documents. MS. KURZON: It's Bates stamped. MR. KORAL: I said it was inadvertently produced. I will make that request as well. I am requesting on the record that you return to us all copies of the document Bates stamped Defendant's 17 to 21. MS. KURZON: 17 to 21? MR. KORAL: Yes. MS. KURZON: So we're not counting as Exhibit 16? MR. KORAL: No. MS. KURZON: I just want to make sure for my numbers. MR. KORAL: It's withdrawn. We'll mark as Defendant's Exhibit 16 a document from Walter Longo to Andrea Porru,
1	LORUSSO A. That's correct. Q. Regarding a memo that you sent on Monday, November 6, to Mr. Porru, copying Walter Longo and Thierry Aucoc. You've already testified that you had your meeting with Mr. Porru regarding the director of regulatory affairs position, right? A. That's correct. Q. But you never heard back from Mr. Porru about the results? A. At this point, I don't think so. Q. But you are not aware of anybody else being hired for that position? A. No. Q. At the time you left Alitalia, do you know whether Mr. Orlando D'Oro was still acting as a consultant for the regulatory affairs position? A. I believe he was. Q. Did Mr. Porru ever discuss with you -- pardon me, ever meet with you to discuss this investigation? A. No. Q. Did you seek such a meeting after you received this e-mail from Mr. Porru?	1 LORUSSO dated 9 November with a copy to Luca Bruni, regarding a Cargo position. And it references an Ester Lorusso e-mail and other documents. (Defendant's Exhibit 16, document, was marked for identification as of this date.) Q. Have you seen this document before? A. I believe I have. Q. All right. Did you ever discuss it with Walter Longo? A. This document? Q. Yes. A. No. Q. It responds to an e-mail from Mr. Porru to Mr. Longo with a copy to Mr. Bruni regarding the Cargo position dated October 30 in which Mr. Porru states that he is conducting an investigation of your allegations of sex discrimination and retaliation. Did you read Mr. Porru's e-mail? A. Yes. Q. At the time you were complaining about being put on probation when you assumed the Cargo position, correct? A. Correct.

73 (Pages 286 to 289)

Ester Lorusso

12/19/2007

	Page 290	Page 292
1 LORUSSO		1 LORUSSO
3 probation when you assumed the position in GA2000?		3 of Alitalia Cargo. Moreover, she took care of the
4 A. That's one of the reasons.		4 organization of the agents database."
5 Q. What are the other reasons?		5 Is that true?
6 A. When Tim O'Neill came into Alitalia he was		6 A. This is true, but you should know that
7 not put on probation either?		7 what you just read took up about 10 percent of my
8 Q. How do you know that?		8 time.
9 A. He told me.		9 Q. What took up the other 90 percent?
10 Q. You asked him or he just volunteered that		10 A. Nothing.
11 he wasn't put on probation?		11 Q. You did nothing for 90 percent of your
12 A. I believe I asked him.		12 time while were you in the Cargo Division?
13 Q. When did you ask him?		13 A. I would say so, other than working on the
14 A. I don't recall.		14 agents database which was just inputting data.
15 Q. Did you ask him at the time he came in to		15 Q. What about the fliers?
16 Alitalia?		16 A. Oh, I could do those in five minutes flat.
17 A. I don't recall.		17 Q. What about the supporting of the launch of
18 Q. Do you recall whether it was around the		18 the new stations?
19 time that you went into Cargo?		19 A. Same thing.
20 A. Most probably.		20 Q. You didn't do much in connection with
21 Q. Did you pass the probation?		21 that?
22 A. Yes, I did.		22 A. I didn't do much.
23 Q. You got a letter from Walter Longo telling		23 Q. Mr. Longo at some point stated that he had
24 you that?		24 encouraged you to get out to the stations and become
25 A. Yes, I did.		25 familiar with them, and that you hadn't done that.
	Page 291	Page 293
1 LORUSSO		1 LORUSSO
2 Q. Did you suffer any ill effects from being		2 Did he encourage you to do that?
3 on probation?		3 A. No. He did not.
4 MS. KURZON: Objection. I don't know what		4 Q. Did you do it?
5 you mean.		5 A. No. I did not.
6 MR. KORAL: Okay. Well, let's see if she		6 Q. Did you ever propose going out to the
7 does.		7 stations?
8 A. I'm sorry. I don't know what you mean.		8 A. Yes, I did.
9 MS. KURZON: Ill effects? Physical		9 Q. To whom?
10 effects?		10 A. To the various managers. Actually, to one
11 MR. KORAL: You made your objection.		11 in particular.
12 Q. Did anything bad happen to you as a result		12 Q. Which one?
13 of being on probation?		13 A. Ferrante, I believe his name is.
14 A. No.		14 Q. Sorry?
15 Q. Okay. Let's move on, then.		15 A. Ferrante, F-E-R-R-A-N-T-E.
16 No, let's go back -- I'm sorry -- to 16,		16 Q. Where is Mr. Ferrante?
17 again. In paragraph 1B on the first page of this		17 A. At JFK.
18 document, Mr. Longo tells Mr. Porru, "Mrs. Lorusso's		18 Q. Mr. Ferrante was the station manager at
19 records in her Cargo responsibility show that she		19 JFK?
20 carried out concrete tests supporting informational		20 A. I don't remember his title.
21 events occurred. In particular, she supported the		21 Q. Wasn't Mr. De Rienzo in charge of JFK, if
22 launch of the new stations, e.g. Atlanta and Los		22 you know?
23 Angeles, the opening/moving of new warehouses,		23 A. I don't remember.
24 Boston and" -- I don't know what YUL is --		24 Q. Anyway, you contacted Mr. Ferrante
25 A. Canada.		25 directly?

74 (Pages 290 to 293)

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